



***MEMORANDUM OF DECISION
FOR ENVIRONMENTAL RESPONSE ACTIONS***

USEPA Brownfield Revolving Loan Fund Program

***DECISION MEMORANDUM
Wildlife Refuge Gateway Visitor Center Site
City of Trenton, Wayne County, Michigan***

Prepared and submitted for approval by:

Soil and Materials Engineers, Inc.

May 27, 2010

Approved by: _____

Downriver Community Conference

Date: _____



1.0 PURPOSE

Soil and Materials Engineers, Inc. (SME) prepared this Decision Memorandum to document the Downriver Community Conference's (DCC's) recommendation to proceed with proposed environmental response actions at the brownfield property known as the Detroit River International Wildlife Refuge (DRIWR) Visitor Center and Parking Redevelopment Project, located in Trenton, Wayne County, Michigan (the site). The environmental response actions will improve the existing soil and concrete exposure barriers that encapsulate contaminated soil at the site. The site is owned by Wayne County and is located at 5437 West Jefferson Avenue, in the City of Trenton, Wayne County, Michigan. The project site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Gateway site. The Gateway site will be incorporated into the over 5,000-acre Detroit River International Wildlife Refuge. The general location of the site is depicted on Figure 1. A schematic design of the DRIWR is presented in Figure 2.

The Downriver Community Conference (DCC) has affirmed the eligibility of Wayne County to receive a total of \$200,000 in subgrants from their U.S. Environmental Protection Agency (USEPA) Brownfields Revolving Loan Fund (RLF) Grant to fund eligible environmental response activities that will improve the existing soil exposure barriers encapsulating contaminated soils within the limits of the site. The USEPA has accepted the affirmative eligibility determination for the use of the RLF funds.

Information about the site's history and the threats to human health and the environment posed by existing contamination is included in the following sections. A summary of the Analysis of Brownfields Cleanup Alternatives (ABCA) of environmental response options, the results of public comment on those options, a description of the proposed environmental response actions, and anticipated costs are also included.

2.0 SITE CONDITIONS AND BACKGROUND

A. Site Location and Description

The Visitor Center site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre DRIWR Gateway site. The Gateway property is located at address 5437 West Jefferson Avenue, in the City of Trenton, Wayne County, Michigan. The legal tax identification number of the site is 54-02-699-000-2. The site is currently being redeveloped into a Visitor Center and associated parking which will become part of the over 5,000-acre DRIWR. The property will be a hub within the Detroit River International Wildlife Refuge and function as a starting point to explore the surrounds and adjacent 465-acre Humbug Marsh. The site will be a public access point to the Refuge via the proposed Visitor Center on the property.

B. Site History

The site was formerly occupied by the Trenton Chemical Facility. Chrysler operated the Trenton Chemical Facility for 44 years to manufacture automobile components such as brake pad adhesives, blended oils, paints, sealers, powered metal parts, asbestos brake pads, and phenolic



brake pistons. The site previously contained wastewater treatment ponds, various buildings that stored chemicals and waste products, a drum burial area, an oil lagoon, a sludge holding area, and a tank farm that contained above grounds storage tanks (ASTs) and underground storage tanks (USTs). In addition, fill material was placed in low-lying areas on the east portion of the site between 1940 and 1967 to expand the site's eastern shoreline and increase the usable size of the site. Soil and groundwater at the site became contaminated as a result of these historical activities.

Plant deactivation activities began in 1990 and the buildings were removed. Some former building concrete floor slabs were left in place as exposure barriers. A Remedial Action Plan and Closure Report (RAP) was completed for the site in 1997 and the Michigan Department of Natural Resources and Environment (MDNRE; f.k.a Michigan Department of Environmental Quality, "MDEQ") granted the site an industrial closure under Part 201 of the Natural Resources and Environmental Protection Act, Public Act 451 of 1994, as amended (NREPA). On-site cleanup activities included the removal or capping of inorganic (asbestos, arsenic, barium, cadmium, lead, cyanide, and thallium) and organic (benzene, chlorobenzene, methylene chloride, toluene, vinyl chloride, and xylene) contaminated soils, and removal of USTs and drums. As part of closure activities the following restrictions were placed on the property deed: 1) soils cannot be removed from the site without characterization, 2) soil and concrete caps must be maintained, and 3) groundwater may not be used as a drinking water source on site.

Wayne County purchased the property in 2002 and since that time has been vacant with the exception of construction activities related to its redevelopment into a park and wildlife refuge. The site is covered with low-lying vegetation with the exception of an asphalt concrete paved access drive and two former building concrete floor slabs. The concrete slabs will be covered with clean soil and the existing soil caps will be improved with additional clean soil as part of the planned response activities.

C. Site Environmental Conditions

Soil and groundwater at the site were contaminated as a result of releases of hazardous and petroleum substances associated with historical activities described above in Section 2(B). Multiple environmental assessments and remedial actions have been completed at the site by various consultants starting in the late 1980s with the most recent assessment in 2005. The site was granted a limited industrial closure in 1997 by the MDEQ (now known as MDNRE) based on an approved RAP. Copies of environmental reports are available at the project document repository established at the IWR Alliance offices located at 9311 Groh Rd., Grosse Ile, MI 48138. Environmental impacts at the site are summarized below and depicted on Figure 3.

- Lead concentrations were measured above Part 201 Generic Residential Direct Contact Cleanup Criteria and Screening Levels (residential direct contact cleanup criteria) in soil on the east portion of the site.
- Lead and arsenic concentrations were measured above Part 201 residential direct contact cleanup criteria in surface soils in several areas of the site, particularly in the southeast portion where fill material is present.

- Xylenes and benzo(a)pyrene concentrations were measured above Part 201 residential direct contact cleanup criteria in soil in the former tank farm area on the south-central portion of the site.
- Selenium, silver, mercury, chlorobenzene, naphthalene, 1,2,4-trimethylbenzene, xylene, fluoranthene, and phenanthrene concentrations were measured above Part 201 residential groundwater surface water interface (GSI) protection cleanup criteria in soil in several areas of the site, particularly in the southeast portion where fill material is present.
- Asbestos-containing materials are capped with one foot of clean soil in the northwestern portion the site.
- Benzene, chlorobenzene, methylene chloride, vinyl chloride, arsenic, barium, cadmium, lead, and thallium concentrations were measured in groundwater above Part 201 residential groundwater surface water interface (GSI) cleanup criteria on the southeastern portion of the site.
- Benzene concentrations were measured in groundwater above Part 201 residential drinking water and GSI cleanup criteria in the former tank farm area on the south-central portion of the site. The benzene contamination was demonstrated to be limited to the former tank farm area and did not extend beyond the site property boundaries.

The soil contamination at the site has been addressed primarily by the installation and maintenance of clean soil caps and left in-place former building concrete floor slabs. The MDEQ approved RAP indicated that no further remedial action was necessary for the groundwater contamination on the southeast portion of the site because source material had been removed and estimated constituent concentrations for groundwater venting to the Trenton Channel of the Detroit River were below the Part 201 GSI criteria.

Based on results of the environmental assessments at the site summarized above, the site meets the definition of a “facility” pursuant to Part 201 of the NREPA and “brownfield” pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The redevelopment of the site into a county park and wildlife refuge will require the improvement of the soil caps and concrete floor slab exposure barriers in five areas of the site. The exposure barrier improvements will be consistent with the 1997 RAP, the restrictive covenants placed on the site, and the 2002 MDEQ approved Compliance Analysis (CA) work plan.

D. Previous Response Actions

Environmental response actions previously completed at the site are documented in the MDEQ approved 1997 RAP. Features associated with the former chemical facility are depicted on Figure 4. The previous environmental response actions are summarized below.

- The above-ground structures were demolished and the debris was removed, transported off-site, and disposed or recycled as appropriate during plant decommissioning activities in 1990.
- Residuals in the former wastewater retention ponds were removed and the ponds deactivated during plant closure activities in 1990. The empty ponds were later filled to grade with imported aggregate and clay fill in 1993.

- Nine USTs were removed from the site and one was abandoned in-place in 1988/1989. Impacted soil around the USTs was removed, transported off-site, and disposed at a licensed landfill. The remaining ASTs and associated piping were removed, transported off-site, and disposed.
- Approximately 1,675 empty drums and 81,000-tons of contaminated soil were excavated, transported off-site, and disposed/treated in 1989. The excavation was backfilled to grade and capped with clay soil in 1993.
- An approximately one-foot thick clay soil cap was installed and subsequently seeded for vegetation on the northeastern portion of the site in 1987. The cap was installed to prevent dermal contact with asbestos-containing materials buried at the site.
- Concrete slabs of former buildings were removed from the western portion of the site in 1995. These activities also included the removal of concrete pavements from the southwestern portion of the site. Concrete slabs of two former buildings located on the north-central portion of the site were repaired and left in place as an exposure barrier. These two concrete slabs remain intact at the site.
- A utility corridor was demolished and debris removed, transported off-site, and disposed in 1995. Contaminated water removed from the utility trench was treated on-site and used for on-site dust control during response activities.
- The 1997 RAP and MDEQ approved limited industrial closure. As a condition of the limited industrial closure, the following deed restrictions were placed on the property deed: 1) soils cannot be removed from the site without characterization, 2) soil and concrete caps must be maintained, and 3) groundwater may not be used as a drinking water source on-site.

E. State and Local Authorities' Roles

A \$200,000 sub-grant from the DCC's US EPA RLF Grant will be provided to Wayne County (the site owner) to help fund environmental response actions necessary to redevelop the site into a park and wildlife refuge. The site will be incorporated into the over 5,000-acre DRIWR. The DRIWR is managed by the IWR Alliance. The IWR Alliance will manage the grant and execute the environmental response actions at the site on behalf of Wayne County. Wayne County will execute a sub-grant agreement with the DCC prior to commencement of the proposed response actions. Wayne County is also a member of the IWR Alliance and will be involved in each step of the implementation of the response actions.

The IWRA Alliance, on behalf of Wayne County, will manage and implement environmental response actions funded by the \$200,000 sub-grant. The DCC will administer the RLF sub-grant to Wayne County.

The State of Michigan's role in the redevelopment of the site is directed by the MDNRE. The MDNRE/MDEQ has already played a significant role in the assessment and cleanup of the site, as demonstrated in Section D above.



Wayne County will ensure continued MDNRE involvement in RLF sub-grant funded brownfield response actions at the site. The MDNRE's primary role is to ensure that environmental response actions conducted at the site are consistent with the state voluntary cleanup program (Part 201). Environmental response actions planned for the site were documented in the October 20, 2002, Part 20107a CA work plan prepared by the Mannik & Smith Group, Inc. (Mannik & Smith) on behalf of Wayne County. The CA outlined how Wayne County will comply with "due care" obligations pursuant to Section 20107a of Part 201 of NREPA and the associated Administrative Rules R299.5901-R299.5919, effective March 11, 1999. The CA was reviewed and approved by the MDEQ, a requirement for use of RLF funds. The MDEQ also prepared a January 13, 2009, letter (Attachment A), reaffirming their approval of the CA in the context of the current site conditions and the revised Administrative Rules R299.51001-R299.51021, effective December 21, 2002. Detailed descriptions of the risk analyses and proposed cleanup criteria; proposed response actions; specific tasks and costs; and proposed environmental sampling, analyses, and QA/QC plans and protocols have, and will continue to be, made available to the MDNRE prior to initiation of the response actions.

3.0 THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

The results of multiple assessments at the site indicate that historical releases of one or more chemical compounds defined as hazardous substances under the CERCLA and Part 201 have occurred at the site. These hazardous substances pose a threat to the human health, welfare and environment. Specifically, various VOCs, PAHs, and metals were measured in soil at concentrations above Part 201 generic residential, commercial, and industrial cleanup criteria.

The site was granted a limited industrial closure in 1997 based in part on existing soil and concrete exposure barriers. However, the thickness of the existing soil and concrete exposure barriers are insufficient to protect human health and the environment for the proposed use as a park and wildlife refuge. Based on the proposed recreational use and the potential for burrowing by wildlife, a due care evaluation determined that a soil cap with a thickness of approximately four to six feet would be required to be protective of human health and the environment. Therefore, the existing soil and concrete exposure barriers will be improved with approximately four to six feet of clean soil.

The DCC has determined that use of RLF sub-grant funds to improve the soil and concrete exposure barriers for contaminated soil on the site is appropriate in accordance with Section 300.415(b)(1) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) based on the following criteria:

- An actual or potential exposure risk to the nearby human population from hazardous substances on the site exists.
- Other appropriate federal or state response mechanisms to respond to the release(s) are not available.
- The IWR Alliance will manage the grant and execute the environmental response actions at the site on behalf of Wayne County. Wayne County is also a member of the IWR Alliance and will be involved in each step of the implementation of the



response actions. Environmental response activities will be funded from a \$200,000 sub-grant from DCC's USEPA RLF Grant. Other response mechanisms are not available because the site is not a priority for state-funded response actions and is not on the CERCLA National Priorities List (NPL) for federal response action.

4.0 ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

SME prepared an ABCA (Attachment B) to evaluate cleanup alternatives to address risks associated with the impacted soil on the site. The ABCA presented a technical and economic feasibility analysis of the following environmental response approaches. The following three environmental response approaches were evaluated:

- No response action;
- Excavation and off-site disposal of impacted soil in a licensed landfill; and
- Improvement of existing soil and concrete exposure barriers.

The DCC published a notice for accepting public comment on the ABCA in the _____ Newspaper on _____. The public comment period lasted from _____. No public comment was received on the ABCA during the public comment period. Following the public comment period, the DCC finalized the ABCA and selected the following environmental response alternatives.

Improvement of the Existing Soil and Concrete Exposure Barriers

Soil is impacted at levels that pose a dermal contact exposure risk for the proposed use. The existing soil and concrete exposure barriers are currently of insufficient thickness to be protective of human health and the environment for the proposed use. The soil exposure barriers consist of approximately 6 to 12 inches of clean imported fill. The existing concrete exposure barriers consist of approximately eight to ten-inch thick concrete slabs. The depth of impact varies by location but generally extends to an average depth of approximately five feet below the ground surface. The existing soil and concrete exposure barriers will be improved with approximately four to six feet of clean soil. This environmental response alternative will be protective of human health and the environment with proper long term maintenance. This alternative was selected because it was more cost effective and would take less time to implement than the alternatives.

5.0 PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Response Activities

The environmental assessments completed to date identified the site as a "facility" and a "brownfield." A detailed CA work plan, documenting appropriate due care obligations and methods for mitigation of human health and environmental threats, was prepared and approved by the MDEQ. The environmental response actions selected for implementation at the site

funded by the \$200,000 sub-grant to Wayne County from the DCC's USEPA RLF Grant are consistent with the due care response actions described in the CA. However, it should be noted, that not all environmental response activities described in the CA will be funded with the \$200,000 sub-grant. In particular, the sub-grant funds are insufficient to completely fund the construction of the necessary improvements to the soil and concrete exposure barriers on the site. The additional environmental response activities described in the CA and a report to document the response activities will be funded by other sources. The final documentation report will be submitted to the MDEQ after completion of response activities.

The \$200,000 sub-grant to Wayne County will fund eligible environmental response activities that will improve the existing soil exposure barriers encapsulating contaminated soils within the limits of the proposed Visitor Center site. More detailed descriptions of the eligible environmental response activities that will be funded by the \$200,000 sub-grant from the DCC's US EPA RLF Grant to Wayne County are presented below:

1. Engineering and Project Management

The construction of the soil cap exposure barrier improvements to be funded with this sub-grant will be designed, the construction will be monitored, and compaction will be tested during placement of clean soil caps.

2. Transportation of Clean Soil from the construction of the Visitor Center

Approximately 5,900 cubic yards of clean soil will be generated during construction of the Visitor Center. The construction activities will be funded from other sources. This sub-grant will fund the on-site transportation of the clean soil generated from construction activities to the soil cap areas.

3. Installation and Construction of Soil Cap Exposure Barrier Improvements

The approximately 5,900 cubic yards of clean soil generated from construction of the Visitor Center and approximately 83,600 cubic yards of imported clean soil will be used to improve existing soil or concrete exposure barriers at the site. The transportation costs for the imported soil will be funded from other sources. The improved exposure barriers will consist of an additional approximately four to six feet of clean soil. The \$200,000 sub-grant will fund the improvement of the existing exposure barriers. The proposed exposure barrier areas to be improved with funds from this sub-grant are depicted on Figure 3.

B. Applicable or Relevant and Appropriate Requirements

The site is a brownfield redevelopment project that is consistent with the operational requirements of the *Superfund Memorandum of Agreement, Addendum I: Brownfields Redevelopment* between the U.S. EPA and MDEQ. Under this agreement, the U.S. EPA recognizes response activities (at sites not listed or proposed for listing on the NPL) carried out under Part 201 of the Natural Resources and Environmental Response Act (NREPA), 1994 PA 451, as amended, MCL 324.20101 et seq. (Part 201).

Response actions conducted at the site are designed to be compliant with the requirements of Part 201 for environmental response actions and safe future use (Due Care) of the site as

provided at MCL 324.20107a and in Rule 1001 (R299.51001). The following applicable parts of NREPA, and the rules promulgated thereto, are ARARs for the proposed response activities:

- Part 201 (MCL 324.20101 et seq.) – Environmental Remediation
- Part 111 (MCL 324.11101 et seq.) – Hazardous Waste Management
- Part 115 (MCL 324.11101 et seq.) – Solid Waste Management
- Part 211 (MCL 324.21101 et seq.) – Underground Storage Tank Regulations
- Part 213 (MCL 324.21301 et seq.) – Leaking Underground Storage Tanks
- CERCLA (US Code Title 42)
- Resource Conservation and Recovery Act (RCRA) – Land Disposal Restrictions (40 CFR 268)
- Hazardous Materials Transportation Act – Hazardous Materials Transportation (49 CFR 172)
- OSHA General Industry Standards (29 CFR 1910)
- OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) (29 CFR 1910.120)
- OSHA Hazard Communication (29 CFR 1910.1200)

C. Project Schedule

The environmental response activities to be funded by the \$200,000 sub-grant are expected to be completed by the summer of 2010.

D. Estimated Costs

The estimated costs for implementation of the selected environmental response action are summarized below:

1. Engineering and Project Management	\$25,000
2. Transportation of Clean Soil from the Construction of the Visitor Center.....	\$5,900
3. Installation and Construction of Soil Cap Exposure Barrier Improvements	\$169,100
TOTAL ESTIMATED COST.....	\$200,000

7.0 DECISION TO PROCEED

The DCC, after consideration of all factors presented in this Decision Memorandum and relevant public comment, issues this Decision Memorandum which authorizes the subgrant recipient to proceed with cleanup activities consistent with the executed subgrant documents and approved cleanup plan. A signed copy of this memorandum will be included in the project file at the project document repository.

SOIL AND MATERIALS ENGINEERS, INC.

Mark J. Quimby
Project Consultant

Daniel R. Cassidy
Senior Project Geologist

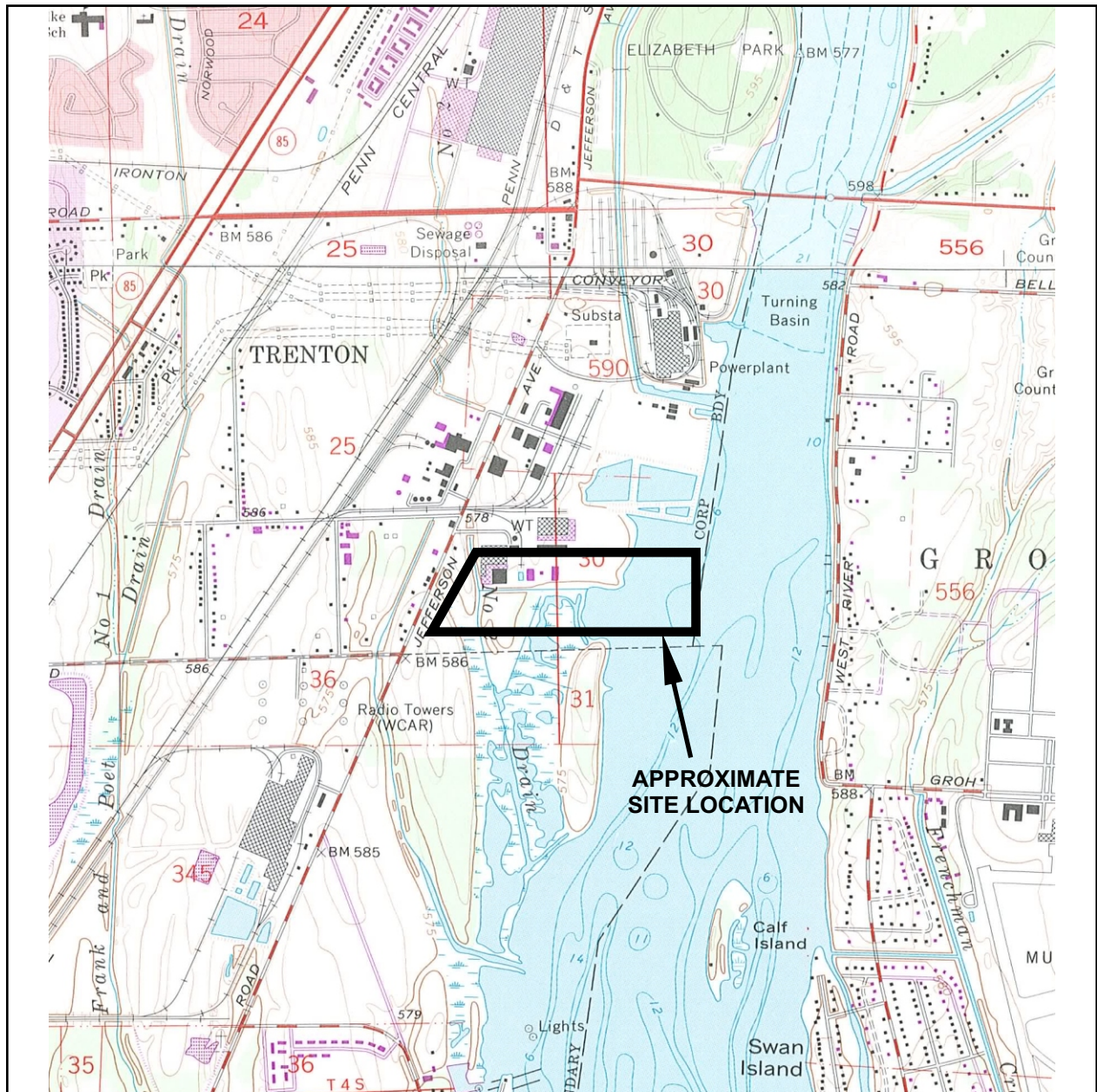
Figures

Attachment A: January 13, 2009, MDEQ CA Reaffirmation Letter
Attachment B: ABCA



FIGURES

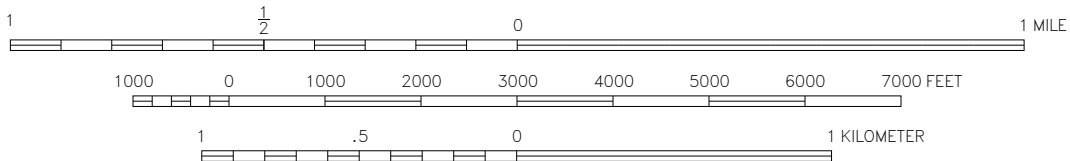
- Figure 1: Site Location Map
- Figure 2: Schematic Site Plan
- Figure 3: Exposure Barrier Location Improvement Diagram
- Figure 4: Summary of Former Chemical Facility Site Features



SCALE 1:24000



QUADRANGLE LOCATION



CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



NOTE:
TOPOGRAPHIC MAPS TAKEN FROM WYANDOTTE AND ROCKWOOD, MICHIGAN 7.5 SERIES USGS TOPOGRAPHIC QUADRANGLE.



Michigan
Indiana
Ohio

Date **04-16-2010**
Drawn By **MJQ**
Designed By **MJQ**
Scale **SEE ABOVE**
Project **PE55161H**


SITE LOCATION DIAGRAM
DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE
GATEWAY VISITOR CENTER AND PARKING
REDEVELOPMENT PROJECT
TRENTON, MICHIGAN

No.	Revision Date

Figure No. 1



NOTE:
1. DRAWING WAS TAKEN FROM WAYNE COUNTY SITE PLAN.
2. FEATURES ARE APPROXIMATE AND NOT TO SCALE.



Michigan
Indiana
Ohio

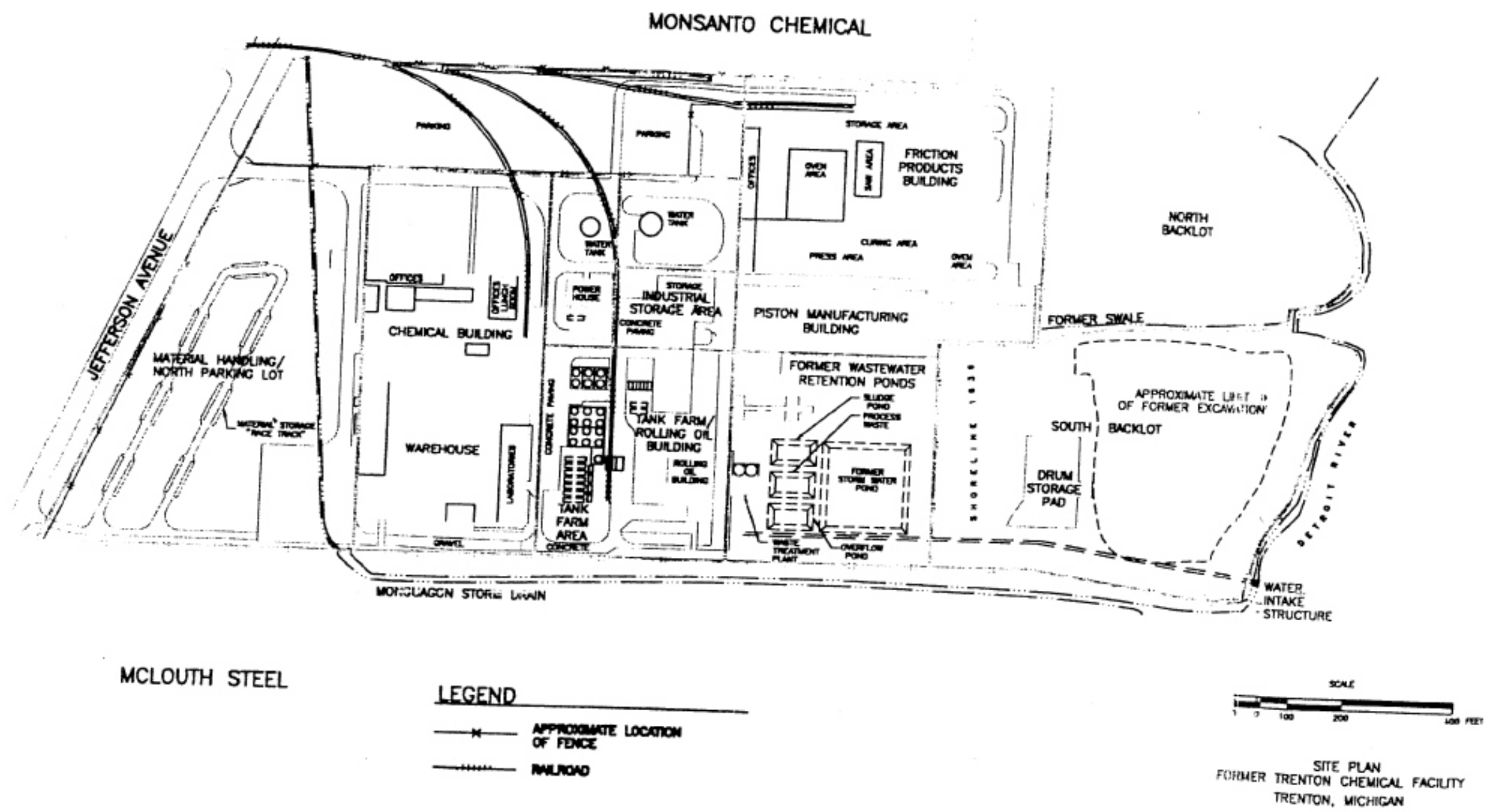
www.sme-usa.com

SCHEMATIC SITE PLAN
DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE
GATEWAY VISITOR CENTER AND PARKING
REDEVELOPMENT PROJECT
TRENTON, MICHIGAN

Date	04/16/2010
Drawn By	MJQ
Designed By	MJQ
Scale	NA
Project	PE55161H

No.	Revision Date

Figure No. 2



NOTE:
 1. DRAWING WAS TAKEN FROM WAYNE COUNTY SITE PLAN.
 2. FEATURES ARE APPROXIMATE AND NOT TO SCALE.


<div> www.sme-usa.com</div>		<div>Date04/16/2010</div> <div>Drawn ByMJQ</div> <div>Designed ByMJQ</div> <div>ScaleNA</div> <div>ProjectPE55161H</div>	<div>SUMMARY OF FORMER SITE FEATURES</div> <div>DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE</div> <div>GATEWAY VISITOR CENTER AND PARKING</div> <div>REDEVELOPMENT PROJECT</div> <div>TRENTON, MICHIGAN</div>		<div>No.</div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>	<div>Revision Date</div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>
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Figure No. 4

ATTACHMENT A

JANUARY 13, 2009, MDEQ CA REAFFIRMATION LETTER





JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

January 13, 2009

Mr. Mark J. Quimby
Soil and Materials Engineers, Incorporated
43980 Plymouth Oaks Boulevard
Plymouth, Michigan 48170-2584

Dear Mr. Quimby:

SUBJECT: Reaffirmation of 2002, Section 20107a Compliance Analysis
DEQ Petition #: P200201857LV
44-Acre Refuge Gateway
Former Trenton Chemical Facility
Jefferson Avenue, Trenton, Michigan

The Department of Environmental Quality (DEQ) has received your request to reaffirm the Compliance Analysis previously approved on November 18, 2002. The DEQ has been involved with the Gateway Refuge project since the property was purchased by Wayne County in 2002.

The site has remained unoccupied with the exception of construction activities related to the redevelopment. The current activities and future use of the property fall within the Compliance Analysis previously submitted and approved. The Compliance and Analysis plan stills meets conditions covered by Administrative Rules R299.51001-R299.51021, amended effective December 21, 2002.

If you have any questions regarding this matter, please contact me at the telephone number below. All correspondence in regards to this site should be forwarded to my attention.

Sincerely,

Edward A. Novak, Environmental Quality Analyst
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3827

cc: Mr. Paul Owens, DEQ

ATTACHMENT B

ABCA





ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA) FOR ENVIRONMENTAL RESPONSE ACTIONS

USEPA Brownfields Revolving Loan Fund Program

Wildlife Refuge Gateway Visitor Center and Parking Site Development City of Trenton, Wayne County, Michigan

Soil and Materials Engineers, Inc. (SME) prepared this Analysis of Brownfields Cleanup Alternatives (ABCA) to present the results of the technical and economic feasibility analyses of the environmental response activities proposed to be implemented at the brownfields property known as the Detroit River International Wildlife Refuge Gateway Visitor Center and Parking site, located in Trenton, Wayne County, Michigan (the site). The Gateway site is owned by Wayne County and is located at 5437 West Jefferson Avenue, in the City of Trenton, Wayne County, Michigan. The Visitor Center and Parking site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Gateway site (Figure 1). The site will be incorporated into the over 5,000-acre Detroit River International Wildlife Refuge.

The Downriver Community Conference (DCC) has affirmed the eligibility of Wayne County to receive a total of \$200,000 in subgrants from their U.S. Environmental Protection Agency (USEPA) Brownfields Revolving Loan Fund (RLF) Grant to fund eligible environmental response activities that will improve the existing soil exposure barriers encapsulating contaminated soils within the limits of the proposed Visitor Center site and associated parking area on the Gateway site. The USEPA has accepted the affirmative eligibility determination for the use of the RLF funds.

The 44-acre Gateway property was formerly occupied by the Trenton Chemical Facility. Chrysler operated the Trenton Chemical Facility for 44 years to manufacture automobile components such as brake pad adhesives, blended oils, paints, sealers, powered metal parts, asbestos brake pads, and phenolic brake pistons. The property previously contained wastewater treatment ponds, various buildings that stored chemicals and waste products, a drum burial area, an oil lagoon, a sludge holding area, and a tank farm that contained above grounds storage tanks (ASTs) and underground storage tanks (USTs). Fill material was also placed in low-lying areas on the eastern portion of the property between 1940 and 1967 to expand the property's eastern shoreline and increase the usable size of the site. Soil and groundwater at the property became contaminated as a result of these historical activities.



Plant decommissioning activities began in 1990 and the above-grade structures on the property were removed, with the exception of selected concrete floor slabs, which were left in place for use as exposure barriers to underlying contaminated soils. A Remedial Action Plan and Closure Report (RAP) were completed for the site in 1997 and the Michigan Department of Natural Resources and Environment (MDNRE) granted the site an industrial closure under Part 201 of the Natural Resources and Environmental Protection Act, Public Act 451 of 1994, as amended (NREPA). On-site cleanup activities included the removal or capping of soils with inorganic (asbestos, arsenic, barium, cadmium, lead, cyanide, and thallium) and organic (benzene, chlorobenzene, methylene chloride, toluene, vinyl chloride, and xylene) contamination as well as the removal of USTs and drums of chemical wastes. As part of the closure, the following restrictions were placed on the property deed: 1) soils cannot be removed from the site without characterization, 2) soil and concrete exposure barriers must be maintained, and 3) groundwater may not be used as a drinking water source.

The environmental conditions of the Gateway property are summarized in the following reports that are available at the project document repository located at the Downriver Community Conference (DCC) offices at 15100 Northline Road, Southgate, Michigan 48195:

- ***Category N Baseline Environmental Assessment Conducted Pursuant to Section 20126(1)(c) of 1994 PA 451, Part 201, as Amended and the Rules Promulgated Thereunder, Parcel ID #54-02-699-000-2, Former Trenton Chemical Facility, Jefferson Avenue, Michigan 48183, Prepared for Wayne County Department of Public Services, Administrative Division, The Mannik & Smith Group, Inc., October 31, 2002.*** This report also includes the following reports as attachments.
 - ***Section 7a Compliance Analysis for the Former Trenton Chemical Facility at Jefferson Avenue in Trenton, Michigan, The Mannik & Smith Group, Inc., October 31, 2002.***
 - ***Remedial Action Plan and Closure Report, Trenton Chemical Facility, Prepared for Chrysler Corporation, McLaren Hart Environmental Engineering Corporation, February 12, 1997.***
- ***Phase II Environmental Site Assessment, International Wildlife Refuge Center, Camp Dresser & McKee (CDM), October 19, 2005.***

The environmental investigations of the Gateway property noted above identified historical releases of one or more chemical compounds defined as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Part 201 have occurred at the site. These hazardous substances pose a threat to the human health, welfare and environment. Specifically, various volatile organic compound (VOCs), polycyclic aromatic hydrocarbons (PAHs), and metals were measured in soil at concentrations above Part 201 generic residential, commercial, and industrial cleanup criteria. The results of technical and economic feasibility analyses of brownfields cleanup alternatives on the Visitor Center and parking site are presented below.

Hazardous substances in soil at the Visitor Center and parking site pose substantial threats to the human health and to the environment for the proposed use as a park and wildlife refuge. These

threats must be mitigated to protect human health and the environment and prepare the site for redevelopment. SME conducted an ABCA to identify the most appropriate environmental response action consistent with the redevelopment plans for the proposed Visitor Center site and associated parking area on the Gateway property. The following three environmental response approaches were evaluated:

- No response action;
- Excavation and off-site disposal of impacted soil in a licensed landfill; and
- Improvement of existing soil and concrete exposure barriers.

Results of the ABCA are summarized in the following subsections.

No Response Action

The no response action alternative is easily implemented without any associated cost. However, absent any response action, the presence of contamination on the site under current conditions would continue to pose an unacceptable exposure risk to human health and the environment. The existing soil and concrete exposure barriers are of insufficient thickness to be protective of human health and the environment for the proposed use of the site. For these reasons, the "no response action" alternative was not selected for the site.

Excavation and Off-site Disposal of Impacted Soil

Soil is impacted at levels that pose a dermal contact exposure risk for the proposed use. The existing soil and concrete exposure barriers are of insufficient thickness to be protective of human health and the environment for the proposed use. The current soil exposure barriers consist of approximately 6 to 12 inches of clean imported fill. The current concrete exposure barriers consist of approximately eight to ten-inch thick concrete slabs. The depth of impact varies by location but generally extends to an average depth of approximately five feet below the ground surface. To access, excavate, and dispose of impacted soil at the property, the clean soil cap would need to be removed and the existing concrete floor slabs would need to be demolished and removed. Removal of the existing soil and concrete exposure barriers and excavation and off-site disposal of the impacted soil is implementable with readily available techniques and technologies; however, this alternative is potentially cost prohibitive.

Approximately 74,600 cubic yards (cy) of impacted soil in total is located within the project site that pose an unacceptable risk to human health and the environment for the proposed use of the site. The impacted soil is encapsulated below approximately 5,900 cy of clean soil and approximately 7,400 cy of concrete. To excavate the encapsulated impacted soil, the clean soil cap would be excavated and stockpiled and the concrete cap would be demolished, removed, and disposed off-site at a licensed disposal facility. The impacted soil would then be excavated, transported, and disposed at a licensed disposal facility. The 5,900 cy of clean soil from the existing soil cap could be reused as clean fill. Based on these estimates, approximately 68,700 cy of clean soil will be required from off-site sources to backfill the excavations. Landfills (Type II) licensed to accept these types of waste are located near the site and have sufficient

capacity. Clean fill from off-site sources is typically generated during other development or redevelopment projects and is anticipated to be available. Mud mats and other control measures would be implemented for out-going trucks to mitigate the risk of tracking contaminated soil off-site. The following table presents a summary of the cost analysis for this approach.

Response Activity Task	Unit Cost	Quantity	Est. Cost
Engineering	\$30,000	1 each	\$30,000
Removal and stockpiling of clean soil caps	\$3/cy	5,900 cy	\$17,700
Demolition and off-site transportation and disposal of concrete caps	\$25/cy	7,400 cy	\$185,000
Excavation and off-site transportation of contaminated soil	\$20/cy	74,600 cy	\$1,492,000
Landfill disposal of contaminated soil	\$15/cy	74,600 cy	\$1,119,000
Transportation of clean soil from on-site locations during construction	\$1/cy	5,900 cy	\$5,900
Acquisition and transport of clean soil from an off-site source	\$8/cy	68,700 cy	\$549,600
Placement and compaction of clean backfill from on- and off-site sources	\$3/cy	74,600 cy	\$223,800
TOTAL ESTIMATED COST			\$3,623,000

The removal and disposal of the impacted soil is not a cost effective way to mitigate the human health threat associated with the dermal contact exposure pathway. This alternative would require the handling and removal of existing soil and concrete exposure barriers and produce no measurable benefit to human health above encapsulating the impacted soil. Moreover, because of the removal of existing exposure barriers and impacted soil, this alternative would be more expensive and take more time to implement than a readily available alternative. Furthermore, the transportation and off-site disposal of the contaminated soil would generate unnecessary truck traffic around the site during construction. This alternative is not recommended for the site because of the high cost, the activity would take too long to implement, and this alternative would not produce a measurable benefit to public health over an easily implementable alternative.

Improvement of the Existing Soil and Concrete Exposure Barriers

Soil is impacted at levels that pose a dermal contact exposure risk for the proposed use. The existing soil and concrete exposure barriers are currently of insufficient thickness to be protective of human health and the environment for the proposed use. The soil exposure barriers consist of approximately 6 to 12 inches of clean imported fill. The existing concrete exposure barriers consist of approximately eight to ten-inch thick concrete slabs. The depth of impact varies by location but generally extends to an average depth of approximately five feet below the ground surface. The existing soil and concrete exposure barriers would be improved with approximately four to six feet of clean soil. The improvement of the existing soil and concrete exposure barriers with additional clean soil is implementable and a potentially cost effective

environmental response alternative that would be protective of human health and the environment with proper long term maintenance.

Preliminary engineering estimates indicate that a total of approximately 89,500 cubic yards (cy) of clean soil will be required to improve the existing soil and concrete exposure barriers to sufficient thickness to mitigate the dermal contact exposure risk and protect human health and the environment for the proposed use of the site. Preliminary engineering estimates indicate that approximately 5,900 cy of clean soil will be generated from removing the existing soil cap, which could be reused as clean fill. Based on this estimate, an additional approximately 83,600 cy of clean soil will be required from off-site sources to complete the improvement of the existing soil caps. Clean fill from off-site sources is typically generated during other development or redevelopment projects and is anticipated to be available. The following table presents a summary of the cost analysis for this approach.

Response Activity Task	Unit Cost	Quantity	Est. Cost
Engineering	\$25,000	1 each	\$25,000
Transportation of clean soil from on-site locations during construction	\$1/cy	5,900 cy	\$5,900
Acquisition and transport of clean soil from an off-site source	\$8/cy	83,600 cy	\$668,800
Construction of soil caps	\$3/cy	89,500 cy	\$268,500
TOTAL ESTIMATED COST			\$968,200

The improvement of the existing soil and concrete exposure barriers with four to six feet of clean fill is implementable with readily available techniques and technologies and would be protective of human health and the environment for the proposed use of the site. This alternative would also cost less money and take less time to implement than the implementable alternative above. This alternative was deemed the most cost effective choice and is the recommended alternative to protect human health and the environment.



COMMUNITY INVOLVEMENT PLAN

USEPA Brownfield Revolving Loan Fund Program Wildlife Refuge Gateway Visitor Center Site City of Trenton, Wayne County, Michigan

I. Overview

The purpose of this Community Involvement Plan (CIP) is to outline how the Downriver Community Conference (DCC) and Wayne County has involved and will continue to involve affected citizens, local officials, and local organizations in the decision-making process regarding the environmental response efforts at the proposed Detroit River International Wildlife Refuge Gateway Visitor Center (the site). The site is owned by Wayne County and is located at 5437 West Jefferson Avenue, in the City of Trenton, Wayne County, Michigan. The Visitor Center site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Detroit River International Wildlife Refuge Gateway site (Figure 1). The Gateway site, including the Visitor Center will be incorporated into the over 5,000-acre Detroit River International Wildlife Refuge.

The City of Trenton is located within Wayne County and is a member of the DCC. The site was formerly occupied by the Chrysler Trenton Chemical Facility for 44 years. Since purchasing the site in 2002, Wayne County has worked to redevelop the site into a park and wildlife refuge. The Gateway property along with the Visitor Center site will be incorporated into the over 5,000-acre Detroit River International Wildlife Refuge. The redeveloped property will consist of a park-like setting with restored woodlands and wetlands, a Visitor Center facility, nature trails, various site amenities, as well as direct and indirect connections to existing waterways, greenways, and the adjoining Humbug Marsh. The site is managed by the International Wildlife Refuge (IWR) Alliance, of which Wayne County is a member. The IWR Alliance will manage the environmental response activities, is managing the redevelopment project, and managed many community involvement and outreach activities for the project.

The DCC is primarily responsible for implementing and managing project community involvement as described in this CIP. Active residents and institutions in the community are essential resources for the success of the CIP because they hold positions of responsibility within the community. The DCC and Wayne County perceives these citizens and organizations as key points of contact and communication. The success of the environmental response actions and subsequent redevelopment of the site relies on informed citizen involvement in each step of the environmental response process.

II. Spokesperson and Information Repository



The spokesperson for this project is Ms. Paula Boase, Program Director, DCC, who may be contacted as noted below:

15100 Northline Road
Southgate, Michigan 48195
Telephone: 734-362-7070
Facsimile: 734-281-6661
Email: Paula.Boase@dccwf.org

A local public information repository for the Wildlife Refuge Gateway Visitor Center Site will be established at the DCC's Southgate office. The repository will include the administrative record, a draft copy of the project Decision Memorandum, Analysis of Brownfield Cleanup Alternatives (ABCA), and other project documents and information relevant to the proposed environmental response actions. Repository documents and records can be accessed by personal request at the DCC. Written comments can be submitted to Ms. Boase at the DCC. A list of the project documents in the document repository is attached.

III. Site Description and History

Site Description:

The Visitor Center site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Detroit River International Wildlife Refuge Gateway site. The Gateway property is located at address 5437 West Jefferson Avenue, in the City of Trenton, Wayne County, Michigan. The legal tax identification number of the site is 54-02-699-000-2. The site is currently being redeveloped into a Visitor Center and associated parking which will become part of the over 5,000-acre DRIWR. The property will be a hub within the Detroit River International Wildlife Refuge and function as a starting point to explore the surrounds and adjacent 465-acre Humbug Marsh. The site will be a public access point to the Refuge via the proposed Visitor Center on the property.

The property is located in a former industrial and commercial area of Trenton. Known current uses of adjoining sites are summarized in the following table:

Direction	Name	Activity
North and Northeast	Solutia	Industrial plastics and resin manufacturing
East	Trenton Channel, Detroit River	N/A
South	Humbug Marsh	Recreational
West (beyond Jefferson Avenue)	Various commercial businesses	Commercial

Most of the site consists of flat, fallow field. The soil contamination at the site was previously addressed primarily by soil remediation followed by the installation and maintenance of clean soil caps and left in-place former building concrete floor slabs.

Site History:

The site was formerly occupied by the Trenton Chemical Facility. Chrysler operated the Trenton Chemical Facility for 44 years to manufacture automobile components such as brake pad adhesives, blended oils, paints, sealers, powered metal parts, asbestos brake pads, and phenolic brake pistons. The site previously contained wastewater treatment ponds, various buildings that stored chemicals and waste products, a drum burial area, an oil lagoon, a sludge holding area, and a tank farm that contained above grounds storage tanks (ASTs) and underground storage tanks (USTs). In addition, fill material was placed in low-lying areas on the east portion of the site between 1940 and 1967 to expand the site's eastern shoreline and increase the usable size of the site. Soil and groundwater at the site became contaminated as a result of these historical activities.

Plant deactivation activities began in 1990 and the buildings were removed. Some former building concrete floor slabs were left in place as exposure barriers. A Remedial Action Plan and Closure Report (RAP) was completed for the site in 1997 and the Michigan Department of Natural Resources and Environment (MDNRE) granted the site an industrial closure under Part 201 of the Natural Resources and Environmental Protection Act, Public Act 451 of 1994, as amended (NREPA). On-site cleanup activities included the removal or capping of inorganic (asbestos, arsenic, barium, cadmium, lead, cyanide, and thallium) and organic (benzene, chlorobenzene, methylene chloride, toluene, vinyl chloride, and xylene) contaminated soils, and removal of USTs and drums. As part of closure activities the following restrictions were placed on the property deed: 1) soils cannot be removed from the site without characterization, 2) soil and concrete caps must be maintained, and 3) groundwater may not be used as a drinking water source on site.

Wayne County purchased the property in 2002 and since that time has been vacant with the exception of construction activities related to its redevelopment into a park and wildlife refuge. The site is covered with low-lying vegetation with the exception of an asphalt concrete paved access drive and two former building concrete floor slabs. The concrete slabs will be covered with clean soil and the existing soil caps will be improved with additional clean soil as part of the planned response activities.

IV. Nature of Threat to Public Health and Environment

The results of multiple previous environmental assessments at the property, including the project site, indicate that historical releases of one or more chemical compounds defined as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Part 201 have occurred at the site. These hazardous substances pose a threat to the human health, welfare and environment. Specifically, various volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and metals were measured in soil at concentrations above Part 201 generic residential, commercial, and industrial cleanup criteria.

The Gateway site, including the Visitor Center site, was granted a limited industrial closure by the MDNRE in 1997 based on an approved RAP. The proposed redevelopment of the site as a park is not consistent with the industrial use for which the site was previously granted closure.



The existing soil and concrete exposure barriers are not protective of human health and the environment for the proposed use of the site as a Visitor Center for the wildlife refuge. The existing soil and concrete exposure barriers at the site must be improved to prevent unacceptable exposure to human health and the environment via the dermal contact exposure pathway. A more detailed summary of the environmental conditions of the site is presented in the Decision Memorandum provided in the document repository.

V. Community Profile

The City of Trenton is a member of the DCC and is located in Wayne County ten miles south of Detroit. The Downriver community of Trenton was founded in 1834. In 1929, a portion of Monguagon Township, called Sibley, was annexed to give Trenton its present size. Trenton became a city in 1957. Trenton's frontage on the Detroit River has played a vital role in the history of the community. Trenton has been the site of shipyards that for years made use of the large stands of oak and other timber, which also made lumbering an important industry in Trenton. Trenton also was once the home of thriving steel and automobile manufacturing.

Today, Trenton is considered a moderately sized city of approximately 20,000 residents. Almost 90 percent of the City is developed with mixed use residential, commercial and industrial land use. As a result, future development in Trenton must include previously developed sites, including brownfield sites. The City has been proactive in identifying brownfield redevelopment sites and facilitating their redevelopment. The City has established an active Brownfield Redevelopment Authority to assist in financing brownfield redevelopment. The City is also working with the DCC and Wayne County to identify and assess brownfield sites, including the former Chrysler Trenton Chemical site, and prepare them for redevelopment.

The redeveloped Wildlife Refuge Gateway property, on which the Visitor Center site is located, will be part of the over 5,000-acre Detroit River International Wildlife Refuge and provide a natural habitat and park for both the City of Trenton and the surrounding communities to enjoy. The Visitor Center is specifically designed as a center of integration for sustainability and environmental education and natural resource interpretation. The Great Lakes school ship will dock there and make use of the river and refuge as a living laboratory for children. School children from Detroit, Downriver, and all of southeast Michigan will regularly come to the Wildlife Refuge Gateway for day-long field trips. Wayne County Community College has committed to providing the funding for a classroom and laboratory for university classes. Children and families will be able to walk out of the Visitor Center and enter Humbug Marsh, walk interpretive trails, stop at learning stations, visit observation decks and an outdoor classroom, and much more. The goal is to reach thousands of children on an annual basis. In addition, a fishing pier will be constructed to provide for shore fishing for trophy walleye. The Detroit River and western Lake Erie are the “walleye capital of the world” and the Wildlife Refuge Gateway fishing pier will allow children and families who do not have a boat to get a world-class fishing experience. Also, a kayak landing will be constructed at the Wildlife Refuge Gateway to offer exceptional kayaking through the International Wildlife Refuge and along the Detroit Heritage River Water Trail.

VI. Chronology of Community Involvement



Community involvement has been an on-going element of the Wildlife Refuge Gateway project. The project has combined unique public-private partnerships for conservation, sustainability, and close-to-home outdoor recreation. The DCC, on behalf of its communities and citizens, promotes the use of private markets, in partnership with the public sector, to solve problems and create economic revitalization opportunities at abandoned and underutilized industrial and commercial properties in downriver communities.

Additional community involvement was centered on DCC's decision to apply for a USEPA RLF grant to provide loans and sub-grants for environmental response actions needed to prepare brownfields sites in downriver communities for redevelopment. The primary goal of the DCC RLF program is to provide loan or sub-grant funds to the private, public and non-profit sectors to encourage their participation in brownfields redevelopment. This project was considered for a sub-grant because of the significant benefit to the public and the lack of sufficient funds to repay a loan. The community outreach and involvement activities conducted as part of the sub-grant application process are summarized below:

- DCC held a board meeting in public session to discuss the proposed Wildlife Refuge Gateway redevelopment project.
- DCC board approved the RLF sub-grant application in public session.

The IWR Alliance has also been heavily involved in soliciting community and stakeholder comment as part of the Wildlife Refuge Gateway redevelopment project. Over the last three years, the IWR Alliance has held the following public meetings to involve the local community and project stakeholders in the project planning process.

- a public hearing for the approval of the project Schematic Plan,
- a public hearing for the approval of the project Master Plan, and
- a public hearing soliciting public comment on the draft Master Plan.

VII. Key Community Concerns

Similar to many communities in metropolitan Detroit, Wayne County and the City of Trenton experienced economic decline from the late 1970s through the late 1990s. Many businesses, especially manufacturing, were forced to close, leaving buildings abandoned and properties neglected. Although parts of Wayne County and the City of Trenton are now experiencing renewed economic growth, many of the previously abandoned properties remain in disrepair, often contaminated, and off the tax records. The presence and added costs for redeveloping these brownfields is a factor inhibiting Wayne County's and Trenton's continued resurgence.

Abandoned and deteriorating industrial facilities, like the former Chrysler Trenton Chemical site, create a variety of community concerns, such as the following:

- loss of jobs and tax revenue;
- uncontrolled environmental contamination; and

- negative community and neighborhood image.

The DCC has identified the existence of numerous brownfields in member communities, including Trenton, as a major concern. The DCC has embarked on an extended campaign to address their brownfield sites; the following activities are examples of their efforts:

- obtained \$400,000 in USEPA Assessment Grants to fund environmental assessments in the downriver communities,
- obtained \$6,500,000 in USEPA RLF Grants to fund low interest loans and sub-grants for environmental cleanups at brownfield sites in the member communities,
- actively markets brownfield sites and member communities to developers, and
- looks for opportunities to form public-private partnerships to redevelop brownfield sites

These activities were crucial steps leading to the former Chrysler Trenton Chemical site redevelopment project. Redevelopment of the former Chrysler Trenton Chemical site represents an important opportunity for the DCC, Wayne County, and the City of Trenton to remove an eyesore and health and safety hazard, and provide educational and recreational opportunities for County and City residents through development of the site and its incorporation into the DRIWR. The restored woodlands and wetlands, nature trails, and direct and indirect connections to existing waterways, greenways, and the adjoining Humbug Marsh will become an important part of the recreational and educational experience in the surrounding communities.

VIII. Continued Community Involvement

The DCC, Wayne County, and the City of Trenton are committed to maintaining community involvement in the Wildlife Refuge Gateway site redevelopment process. Community involvement activities will include public meetings and hearings held by the DCC, approval of key environmental and redevelopment actions in public meetings; public input throughout the site plan review and approval process; and maintenance of the public repository of key documents.

Opportunities for continued public participation in decisions concerning environmental response actions at the site will be provided primarily through the DCC. Environmental response actions at the site will be partially funded with a \$200,000 sub-grant from the DCC's USEPA RLF Grant to Wayne County. The IWR Alliance, on behalf of Wayne County, will manage the implementation of the environmental response activities at the site. As part of both these programs, the IWR Alliance, Wayne County, and the DCC will engage public notice, public hearing, and informational activities in the community.

In conformance with USEPA guidelines and Act 381 requirements, public notices will be published and disseminated, public hearings will be conducted, and documents and plans will be approved by public bodies in public session prior to initiation of response actions at the site. The following is a summary of those public notices, hearings, and sessions:

- published notice announcing the proposed response actions and the document repository;

- published notice of the draft Analysis of Brownfield Cleanup Alternatives (ABCA), and other relevant site documents with a 15-day comment period. The 15-day comment period was deemed sufficient because of the long history of community involvement with the project;
- published notice of the public hearing to be held by the DCC at the conclusion of the 15-day comment period to review submitted written comments and accept oral comments on the Decision Memorandum and ABCA;
- submitted comments will be evaluated by the DCC, and addressed in the final Decision Memorandum which will approve the use of sub-grant funds.

The document repository will be maintained and updated throughout the RLF-funded environmental response phase of the Wildlife Refuge Gateway Visitor Center Site.



QUALITY ASSURANCE/QUALITY CONTROL PROGRAM FOR ENVIRONMENTAL DATA COLLECTION

***US EPA Brownfield Revolving Loan Fund Grant Program
Cooperative Agreement BF-00E93501
Downriver Community Conference***

1.0 INTRODUCTION

The objective of this memorandum is to document the Quality Assurance/Quality Control (QA/QC) program for collection and use of environmental data during non-time critical removal actions (environmental response actions) conducted at brownfield sites funded with a loan(s) or sub-grant from the Downriver Community Conference (DCC)'s Brownfield Revolving Loan Fund (RLF) Grant awarded by the United States Environmental Protection Agency (USEPA). Soil and Materials Engineers, Inc. (SME) of Plymouth, Michigan, developed and documented this project QA/QC program for the DCC.

The DCC consists of the following member communities: City of Dearborn, City of Taylor, City of Monroe, Port of Monroe, City of Riverview, City of Romulus, City of Trenton, City of Wyandotte, City of Gibraltar, Grosse Ile Township, City of Melvindale, the City of Ecorse, and Wayne County, and Monroe County. The DCC manages the BRLF Grant and all brownfield redevelopment projects funded therewith.

The project QA/QC program will follow the requirements and protocols established by the Michigan Department of Natural Resources and the Environment – Remediation and Redevelopment Division (MDNRE-RRD) pursuant to Part 201 of the Michigan Natural Resources and Environmental Protection Act, as amended (Part 201). Part 201 defines the cleanup program for contaminated sites within the State of Michigan. The Part 201 QA/QC requirements satisfy the data quality objectives (DQOs) required by the USEPA for response actions funded wholly or in part by RLF funds. DQOs required by the USEPA for brownfield sites are outlined in the Cooperative Agreement (CA) between the USEPA and the DCC, dated October 17, 2006. The Part 201 QA/QC program requirements and documentation are discussed in further detail below.

2.0 APPLICATION OF MICHIGAN'S CLEANUP PROGRAM QUALITY ASSURANCE REQUIREMENTS

The MDNRE has published guidance documents and operational memoranda that define QA/QC practices, policies, procedures, specifications, and standards required to produce environmental data of sufficient quality to meet Part 201 program objectives. The collective Part 201 QA/QC



program complies with 40 CFR 31.45 requirements for practices to produce data adequate to meet project objectives and to minimize data loss and are consistent with the requirements of USEPA Order 5360.1, April 1984, as amended. Specifically, this document serves as an “equivalent substitute” for a USEPA approved Quality Assurance Project Plan. The following is a summary of typical USEPA quality assurance program elements and the corresponding MDNRE guidance documents for defining and implementing those elements within the Part 201 program:

Data Generation and Acquisition

Sampling Process Design

- MDNRE Sampling Strategies and Statistics Training Materials, 2002.
- MDNRE Procedure for Collection and Methanol Preservation of Soil Samples for Volatile Organics.
- MDNRE Guidance Groundwater Monitoring.
- MDNRE Guidance Monitoring Well Installation.
- MDNRE Guidance Summary of Aquifer Analysis Methods.

Sampling Methods

- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 5 - Collection of Samples for Comparison to Generic Criteria.
- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 6 - Sampling Methods for Volatile Organic Compounds.
- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 7 - Low Level Mercury Sampling Specifications.

Sample Handling

- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 4 - Sampling Preservation, Sample Handling, and Sample Holding Time Specifications.

Analytical Methods

- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 1 - Targeting Detections Limits and Designated Analytical Methods.

Quality Control

- MDNRE ERD Operational Memorandum No. 13 - Data Quality Objectives.

Instrument Calibration and Frequency



- MDNRE ERD Operational Memorandum No. 13 - Data Quality Objectives.

Assessment and Oversight

Assessment and Response Actions

- MDNRE RRD Operational Memorandum No. 2 - Sampling and Analysis Guidance, October 22, 2004 - Attachment 8 - Assessments for Sites Contaminated with Petroleum Products.
- MDNRE RRD Operational Memorandum No. 4 - Site Characterization and Remediation Verifications, under development.
- MDNRE ERD Operational Memorandum No. 5 - Environmental Assessments and Audits, September 29, 1991.

Data Validation and Usability

Data Review, Verification, and Validation

- MDNRE ERD Operational Memorandum No. 13 - Data Quality Objectives.

Environmental analysis data will be collected and used to verify the locations and extents of areas of contamination ("hot spots") subject to response actions and to verify successful and complete remediation of contaminated media to applicable and relevant MDNRE cleanup criteria defined in rules promulgated pursuant to Part 201. Samples will be collected, preserved and analyzed, and resulting data will be evaluated and validated, in accordance with the DQO-appropriate methods and procedures specified in MDNRE guidance (see above) applicable to the project.

3.0 USEPA MEMORANDUM OF AGREEMENT FOR MICHIGAN'S CLEANUP PROGRAM UNDER PART 201 OF THE NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT (NREPA).

The relationship between the USEPA RLF Program and the MDNRE Part 201 cleanup program is outlined in a USEPA Superfund Memorandum of Agreement (SMOA) with the State of Michigan. This SMOA is included with this document as Attachment A.

On July 10, 1996, the USEPA and MDNRE entered into SMOA, *Addendum 1: Brownfields Redevelopment*. The SMOA provides that USEPA "...will not plan or anticipate any federal action against a covered party (owner, operator, generator, or transporter) under the Superfund law when one or more of the following conditions is satisfied: (1) The covered party is a new owner/operator who discloses a Baseline Environmental Assessment (BEA) to the MDNRE and is not otherwise liable for environmental contamination existing on the site. A BEA does not relieve the covered party from its due care obligations under federal and state law, or (2) the covered party conducts its activities on the property consistent with an MDNRE-approved

Remedial Action Plan (RAP) for closure." The decision to not take federal action was written to apply to both past and future MDNRE determinations. SME's and the DCC's interpretation of this SMOA is that the USEPA supports and encourages use of the Part 201 regulations and program as an equivalent substitute for the USEPA requirements.

4.0 STATE OF MICHIGAN INVOLVEMENT

The DCC will ensure the State of Michigan's involvement in each brownfield response action funded through the USEPA RLF Grant. The State of Michigan's role for the response activities will be directed by the MDNRE-RRD. Descriptions of the risk analyses and proposed cleanup criteria; proposed response actions; specific tasks; and proposed environmental sampling, analyses, and QA/QC plans and protocols will be made available to the MDNRE prior to initiation of response actions. The purpose of the MDNRE involvement, at a minimum, will be to obtain MDNRE acknowledgement that the proposed environmental response actions are not inconsistent with a response action pursuant to Part 201. This information may be provided to the MDNRE for review and comment via many mechanisms defined in Part 201. Some examples of these are a Remedial Action Plan (RAP), Plan for Interim Response Designed to Meet Criteria (IRDCP), Response Action Work Plan, Part 20107a Compliance Analysis (CA), Due Care Plan, or in some cases a less formal written summary. The mechanism for MDNRE involvement will be project specific.

USEPA

5.0 CONCLUSION

The DCC shall require environmental data generation, QA/QC, and reporting activities on brownfields, where environmental response activities are funded with USEPA RLF Grant funds to comply with the applicable State of Michigan voluntary cleanup program and DQOs applicable to the project tasks. At the conclusion of RLF-funded activities at these brownfields, a report will be prepared to document response actions. Reports that document data generation activities shall include the appropriate references to Michigan QA/QC guidance documents and operational memoranda. All reports will be placed in the Administrative Record for the site, and copies will be sent to the USEPA for placement in the Cooperative Agreement file.



ATTACHMENT A - SUPERFUND MEMORANDUM OF AGREEMENT

Addendum I: Brownfields Redevelopment

<http://www.deq.state.mi.us/documents/deq-rrd-sf-sfmoa1.PDF>

Addendum II: Site Assessments

<http://www.deq.state.mi.us/documents/deq-rrd-sf-sfmoa2.pdf>





RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



February 11, 2011

Ms. Paula Boase
Director of Economic Development
Downriver Community Conference
15100 Northline Road
Southgate, Michigan 48195

Dear Ms. Boase:

SUBJECT: Petroleum Eligibility Determination for the Detroit River International Wildlife
Refuge Gateway Visitor Center, Taylor, Michigan

This letter acknowledges that the Downriver Community Conference Brownfield Coalition (DCCBC) notified the Department of Natural Resources and Environment (DNRE), Remediation Division, of its plans to make a subgrant to Wayne County from the conference's EPA Revolving Loan Fund to perform eligible environmental response actions at the above referenced site.

The DCCBC, with information regarding the partially petroleum contaminated site and property ownership, requested that the DNRE make the necessary determination on eligibility for brownfield funding. Based on the information provided, the DNRE has determined:

1. The site, a nine acre parcel of the former Chrysler Trenton Chemical Plant (facility #82000009), located at 5437 West Jefferson is of 'relatively low risk', as compared with other petroleum sites because the site has received an industrial closure from the DNRE. There are no underground storage tanks (USTs) at the property currently, although historically, several USTs and ASTs were in use. The property was formerly a chemical manufacturing plant for various automotive components. The subject property is not being cleaned up using Leaking Underground Storage Tank trust fund monies and is not subject to a response under the Oil Pollution Act.
2. A. The DNRE is not aware that a responsible party has been identified through:
 - (a) a judgment in a court of law or an administrative order issued by an administrative body that would require that party to assess, investigate, or clean up the site; or
 - (b) a filed enforcement action brought by federal or state authorities, or is party to a citizen suit, that would, if successful, require that party to assess, investigate, or clean up the site; or
 - (c) A citizen suit, contribution action or other third party claim brought against the current or immediate past owner for the site that would, if successful,

require the assessment, investigation, or clean up of the site.

2. B. The current owner of the property is Wayne County, which purchased the property from Chrysler in 2002 and performed a baseline environmental assessment (BEA). The previous owner, Chrysler Corporation received a limited industrial closure in 1998. Based upon information in the DNRE's environmental site database and from the applicant, it appears that the current and previous owners have taken reasonable steps with regard to stopping any potential petroleum releases, have prevented any threatened future releases of petroleum, and have prevented or limited exposure to any previously released petroleum contamination at the site.
3. The applicant is a volunteer who is not liable for the petroleum contamination because they did not own or operate any petroleum dispensing or storage system at the subject site.
4. The partially petroleum contaminated site is not subject to any order issued under 9003(h) of the Solid Waste Disposal Act.

The information reviewed above is consistent with the determinations set forth in Section 101 (39)(d)(II)(bb) of the Comprehensive Environmental Response, Compensation, and Liability Act. The DNRE finds no reason why the DCCBC cannot use its revolving loan fund to help Wayne County conduct environmental activities to assist in the redevelopment of this property. The project manager for this site is Ms. Patricia Thornton, DNRE Southeast Michigan District, 27700 Donald Court, Warren, Michigan 48902. If you have any questions, feel free to contact me at the number below or by email at smedleyr@michigan.gov.

Sincerely,



Ronald L. Smedley
Brownfield Redevelopment Coordinator
Program Support Section
517-373-4805

cc: Michael Gifford, EPA Region 5
Patricia Thornton, DNRE

**Determination of Site & Property Ownership Eligibility for
USEPA Brownfield Revolving Loan Fund Utilizing USEPA Criteria**

The Downriver Community Conference Brownfield Coalition (the DCC) has made an affirmative determination as to the eligibility of the site described herein to receive a subgrant from the DCC's U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Petroleum Grant. The subgrant will be used to fund eligible environmental response actions at the Detroit River International Wildlife Refuge Gateway Visitor Center and Parking Redevelopment Project in Trenton, Michigan (the project site). The project site is located the eastern portion of the Detroit River International Wildlife Refuge Gateway in Trenton, Michigan (the Gateway site). The figure attached depicts the project site (Area 3 and Area 4). The basis for the eligibility determination is presented below.

- 1. Identify the proposed sub-grantee:** Wayne County, 600 Randolph, Detroit, MI 48226
- 2. Site Name:** Detroit River International Wildlife Refuge Gateway Visitor Center and Parking Redevelopment Project.
 - a. Site Address:** 5437 West Jefferson Avenue, Trenton, MI 48183. The project site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Gateway site. The legal tax identification number of the Gateway site is 54-02-699-000-2.
 - b. Operational History and Environmental Concerns:** The Gateway site was formerly occupied by the Trenton Chemical Facility. Chrysler Corporation (Chrysler) operated the Trenton Chemical Facility for 44 years in the manufacture of automobile components such as brake pad adhesives, blended oils, paints, sealers, powered metal parts, asbestos brake pads, and phenolic brake pistons. The Gateway site previously contained wastewater treatment ponds, various buildings that stored chemicals and waste products, a drum burial area, an oil lagoon, a sludge area, and a tank farm that contained above grounds storage tanks (ASTs) and underground storage tanks (USTs). In addition, fill material was placed in low-lying areas on the east portion of the Gateway site between 1940 and 1967 to expand the site's eastern shoreline and increase the usable size of the site. Soil and groundwater at the Gateway site became contaminated as a result of these historical activities.

Plant deactivation activities began in 1990 and the buildings were removed but some foundations remain in place. A Remedial Action Plan and Closure Report (RAP) was completed for the Gateway site in 1997, and the Michigan Department of Natural Resources and the Environment (MDNRE, f/k/a Michigan Department of Environmental Quality) granted the Gateway site an industrial closure under Part 201 of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). On-site cleanup activities included the removal or capping of inorganic (asbestos, arsenic, barium, cadmium, lead, cyanide, and thallium) and organic (benzene, chlorobenzene, methylene chloride, toluene, vinyl chloride, and xylene) contaminated soils. The closure also included the removal of underground storage tanks and drums and the following deed restrictions: soils cannot be removed from the

Gateway site without characterization, soil and concrete caps must be maintained, and groundwater may not be used as a drinking water source.

- c. Current Site Use and Activity: The Gateway site is currently being redeveloped into the Wildlife Refuge Visitor Center and parking area. The Gateway site will include a park-like setting with restored woodlands and wetlands, a new Visitor Center facility, nature trails, various site amenities, as well as direct and indirect connections to existing waterways, greenways, and the adjoining Humbug Marsh. The redevelopment of the Gateway site and the construction of the Visitor Center Facility will require the additional capping of select areas of the Gateway site to ensure the protection of human health and the environment. The project site is bound by the cap improvement areas depicted on the attached figure (Area 3 and Area 4).

3. Identify who currently owns the site.

- a. Current Ownership of Site: Wayne County owns the Gateway site and purchased it on December 20, 2002.
- b. Previous Owner of the Site: Wayne County purchased the Gateway site from the Chrysler.

4. Site Affirmations:

- a. The site is not listed or proposed for listing on the National Priorities List (NPL).
- b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- c. The site is not subject to the jurisdiction, custody, or control of the United States government.

5. Identify how the site became contaminated and, to the extent possible, describe the nature and extent of the contamination.

Soil and groundwater at the Gateway site were contaminated as a result of releases of hazardous and petroleum substances associated with historical activities described above in Section 2(b). Multiple environmental assessments and remedial actions have been completed at the Gateway site starting in the late 1980s with the most recent in 2005. The following summarizes the environmental concerns at the Gateway site:

- Lead concentrations were measured above MDNRE Part 201 Generic Residential Direct Contact Cleanup Criteria and Screening Levels (residential direct contact cleanup criteria) in soil on the east portion of the Gateway site.
- Lead and arsenic concentrations were measured above MDNRE Part 201 residential direct contact cleanup criteria in surface soils in several areas of the Gateway site, particularly in the southeast portion where fill material is present.

- Xylenes and benzo(a)pyrene concentrations were measured above MDNRE Part 201 residential direct contact cleanup criteria in soil in the former tank farm area on the south-central portion of the Gateway site.
- Selenium, silver, mercury, chlorobenzene, naphthalene, 1,2,4-trimethylbenzene, xylene, fluoranthene, and phenanthrene concentrations were measured above MDNRE Part 201 residential groundwater surface water interface (GSI) protection cleanup criteria in soil in several areas of the Gateway site, particularly in the southeast portion where fill material is present.
- Asbestos-containing materials are capped with one foot of clean soil in the northwest “backlot” area of the Gateway site.
- Benzene, chlorobenzene, methylen chloride, vinyl chloride, arsenic, barium, cadmium, lead, and thallium concentrations were measured in groundwater above MDNRE Part 201 residential groundwater surface water interface (GSI) cleanup criteria on the southeast portion of the Gateway site.
- Benzene concentrations were measured in groundwater above MDNRE Part 201 residential drinking water and GSI cleanup criteria in the former tank farm area on the south-central portion of the Gateway site. The benzene contamination was demonstrated to be limited to the former tank farm area and did not extend beyond the Gateway site property boundaries.

The soil contamination at the Gateway site has been addressed primarily by the installation and maintenance of clean soil caps. The MDNRE approved RAP indicated that no further remedial action was necessary for the groundwater contamination on the southeast portion of the Gateway site because source material had been removed and estimated constituent concentrations for groundwater venting to the Trenton Channel of the Detroit River were below the Part 201 groundwater surface water interface criteria.

6. Liability for contamination and known ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is sought.

Wayne County is not liable for contamination at the Gateway site under the Federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or Part 201 of Michigan’s Natural Resources and Environmental Protection Act (NREPA). Therefore, Wayne County is also not liable for contamination at the project site, which is located on a portion of the larger Gateway site.

Wayne County consulted with the USEPA, regarding potential liability for contamination at the Gateway site with respect to CERCLA. Wayne County received a September 25, 2002, letter from the USEPA stating that no further Superfund action was contemplated at the Gateway site since contamination at the site had been addressed with the 1997 MDNRE approved RAP. Moreover, the USEPA noted that the RAP completed the requirements outlined in a 1994 Consent Decree issued to Chrysler by the MDNRE. Furthermore, the 1994 Consent Decree included a provision by which a prospective purchaser could enter into an agreement with Chrysler and the State of Michigan and receive a covenant-not-to-sue from the State for pre-existing conditions. Prior to purchasing the Gateway site, Wayne County executed this provision and received an Administrative Order on Consent, Covenant

Not to Sue and Contribution Protection from the Michigan Department of the Attorney General and Chrysler.

Wayne County is also not liable for contamination at the Gateway site under Michigan's Part 201 of NREPA. In addition to the activities described above, prior to purchasing the Gateway site, Wayne County completed a Category "N" Baseline Environmental Assessment (BEA) and Section 7a Compliance Analysis (CA). The Category "N" BEA stated that Wayne County will not use any significant hazardous substances at the Gateway site and that fact formed the basis for delineating pre-existing contamination at the time of purchase from future contamination. The MDNRE reviewed and affirmed that the BEA was adequate for obtaining a liability exemption for the cleanup of pre-existing contamination at the Gateway site. The MDNRE also reviewed and affirmed that the CA was consistent with the due care obligations set forth in Section 20107a of the NREPA for the protection of human health.

Future construction activities on the Gateway site must comply with the Restrictive Covenant included in the 1997 RAP and specifically must maintain soil cap exposure barriers. Wayne County's primary due care responsibilities during construction of the DRIWR will consist of maintaining and improving soil caps.

7. Timing of Hazardous Substance Disposal:

Wayne County is not liable for contamination at the Gateway site and affirms that they have not, at any time, arranged for the disposal of hazardous substances at the Gateway site, transported hazardous substances to the Gateway site, or caused or contributed to any release of hazardous substances at the Gateway site. Disposal of hazardous substances at the Gateway site occurred prior to acquisition by Wayne County.

8. Pre-Purchase Inquiry:

Prior to Wayne County Ownership in 2003

- Chester Engineers began plant deactivation activities in 1987 on behalf of the Chrysler Corporation.
- McLaren Hart Environmental Engineers Corporation completed the 1997 RAP and associated activities on behalf of the Chrysler Corporation. The RAP completed the requirements of the MDNR Consent Decree which also included the following investigations/reports:
 - Site Assessment Report (1994)
 - Health and Safety Plan (1995)
 - Quality Assurance Project Plan (1995)
 - Sampling and Analysis Plan (1995)
 - Site Assessment Work Plan (1995)
 - Final Site Assessment Summary Report (1995)
- Wayne County conducted All Appropriate Inquiries (AAI) consistent with the standards of an ASTM 1527-00 Phase I ESA. Wayne County evaluated the history of the previous uses of the Gateway site and surrounding area. This included obtaining and reviewing the documents listed above that evaluated recognized environmental

conditions (RECs) associated with the past uses of the Gateway site. This evaluation also included the potential for impact from adjacent properties. Documents were reviewed for accurateness and completeness and sources were verified. Secondly, Wayne County completed a site reconnaissance to verify site conditions. The visit entailed both a visual and physical observation of the Gateway site to evaluate existing conditions and the remedial measures implemented by Chrysler to satisfy site-closure pursuant to the conditions of the 1994 consent decree between Chrysler and the MDNR. Lastly, interviews were conducted with local government officials and other individuals with knowledge of past historical uses of the Gateway site and the current site conditions. The Gateway site was vacant from 1994 until construction for the Wildlife Refuge began in 2009.

- The Mannik & Smith Group, Inc. completed a Category “N” BEA and CA for the Gateway site in 2002 on behalf of Wayne County prior to their acquisition of the Gateway site.

Subsequent to Wayne County Ownership in 2003

- Camp Dresser & McKee conducted a Phase II ESA of the Gateway site in 2005 for Hamilton Anderson Associates on behalf of Wayne County.

9. Post-Acquisition Uses:

Since acquiring the Gateway site in 2002, Wayne County has worked to redevelop the Gateway site into a county park and wildlife refuge as described in Section 2(b). The Gateway site will continue to be owned by Wayne County and the Gateway site will be managed by the International Wildlife Refuge (IWR) Alliance.

10. Affirm that the RLF Grant recipient is not potentially liable for contamination at the site under CERCLA Section 107

The DCC is not liable for contamination at the Gateway site, which includes the project site, under CERCLA or Part 201 of NREPA. The DCC is not a current owner of the Gateway site, was not an owner or operator of a facility on the Gateway site at time of disposal of a hazardous substance, did not arrange for treatment or disposal of hazardous substances at facilities on the Gateway site, and did not accept hazardous substances for transport to disposal or treatment facilities at the Gateway site. The DCC affirms that they have not, at any time, caused or contributed to any release of hazardous substances at the Gateway site.

11. Affirm that the sub-grant recipient is not potentially liable for contamination at the site under CERCLA Section 107

As discussed in response 5 above, Wayne County is not liable for contamination at the Gateway site, which includes the project site, under CERCLA or Part 201 of NREPA. Wayne County was not an owner or operator of a facility on the Gateway site at time of disposal of a hazardous substance, did not arrange for treatment or disposal of hazardous substances at facilities on the Gateway site, and did not accept hazardous substances for transport to disposal or treatment facilities at the Gateway site. Wayne County affirms that they have not, at any time, caused or contributed to any release of hazardous substances at the Gateway site.

12. Continuing Obligations:

The redevelopment of the Gateway site into a county park and wildlife refuge will require the improvement of the soil cap exposure barrier in five areas of the Gateway site. The cap improvements will be consistent with the 1994 Consent Judgment, the 1997 RAP, and the restrictive covenants placed on the Gateway site.

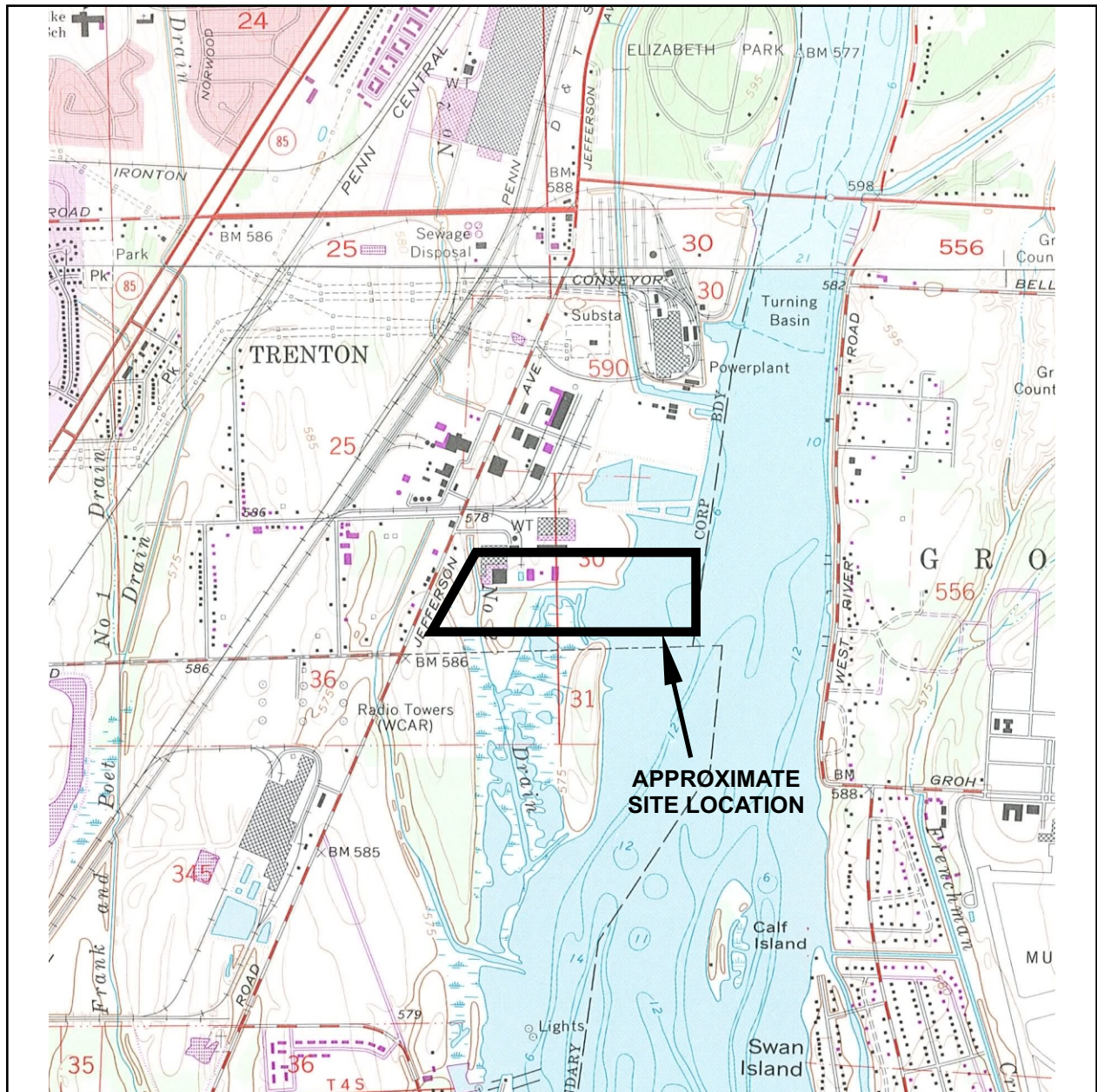
- a. Continuing Releases: Source material has been removed from the Gateway site and the 1997 RAP did not require additional actions related to groundwater contamination at the Gateway site.
- b. Prevent Future Releases: Wayne County will not use any hazardous substances at the Gateway site.
- c. Prevent or Limit Exposure to Previously Released Hazardous Substances: Wayne County will maintain or improve the existing soil caps at the Gateway site to prevent human and environmental exposure to the encapsulated contaminated soil.
- d. Wayne County will comply with all land use restrictions and institutional controls at the Gateway site.
- e. If the liable party is required to conduct additional cleanup actions, Wayne County will assist and cooperate with the cleanup and provide access to the Gateway site.
- f. Wayne County will comply with all information requests and administrative subpoenas that have or may be issued in connection with the Gateway site, and provide all legally required notices.

13. Petroleum Sites Required Information

- a. Current and Immediate Past Owners: Refer to response 3A and 3B above.
- b. Acquisition of Site: Wayne County purchased the site on December 20, 2002.
- c. No Responsible Party for the Site: Refer to response 6 above.
- d. Cleaned Up by a Person Not Potentially Liable. Wayne County has not and will not dispense or dispose of petroleum or petroleum product, or exacerbate the existing petroleum contamination at the site. During redevelopment of the site, reasonable steps with regard to the contamination at the site will be taken. Because the site is a “facility,” Wayne County will comply with obligations under Section 20107a. “Due Care” obligations including: (1) undertaking measures to prevent exacerbation of existing contamination; (2) exercising due care by undertaking response activities to mitigate unacceptable exposure to hazardous substances and allow for the intended use of the site in a manner that protects health and safety; (3) taking reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that could result from those acts or omissions; (4) provide reasonable cooperation, assistance, and access to the persons that are authorized to conduct response activities at the facility; (5) comply with any land use or resource use restrictions established or relied on in connection with the response activities at the facility; and (6) not impede the

effectiveness or integrity of any land use or resource use restriction employed at the facility in connection with response activities.

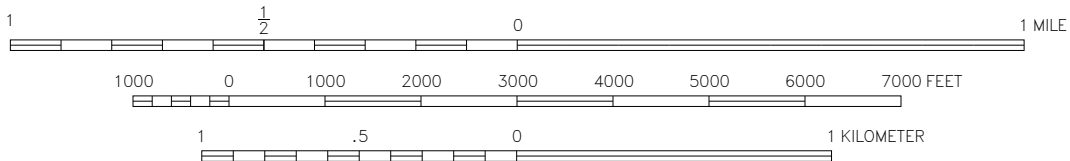
- e. Relatively Low Risk: The site is of “relatively low risk” compared to other petroleum or petroleum product-only contaminated sites in Michigan. The site is not receiving or using LUST Trust Fund monies.
- f. Judgments, Orders, or Third Party Suits: Refer to response 6 above.
- g. Subject to RCRA. The site is not known to be subject to any order under section 9003(h) of the Solid Waste Disposal Act.
- h. Financial Viability of Responsible Parties: Refer to response 6 above.



SCALE 1:24000



QUADRANGLE LOCATION



CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



NOTE:
TOPOGRAPHIC MAPS TAKEN FROM WYANDOTTE AND ROCKWOOD, MICHIGAN 7.5 SERIES USGS TOPOGRAPHIC QUADRANGLE.



Michigan
Indiana
Ohio

Date **04-16-2010**
Drawn By **MJQ**
Designed By **MJQ**
Scale **SEE ABOVE**
Project **PE55161H**

SITE LOCATION DIAGRAM
DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE
GATEWAY VISITOR CENTER AND PARKING
REDEVELOPMENT PROJECT
TRENTON, MICHIGAN

No.	Revision Date

Figure No. 1



NOTE:
1. DRAWING WAS TAKEN FROM WAYNE COUNTY SITE PLAN.
2. FEATURES ARE APPROXIMATE AND NOT TO SCALE.



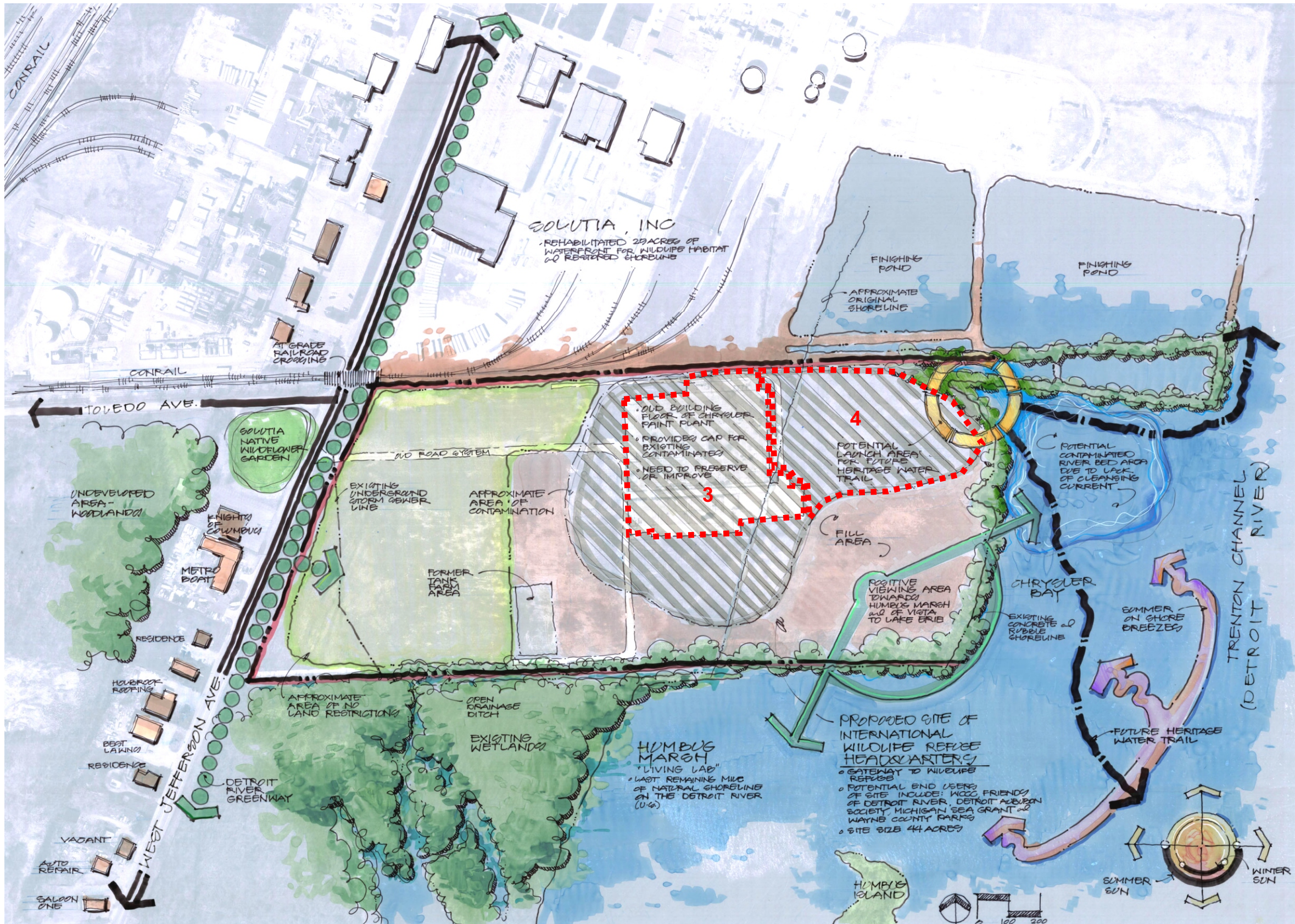
Michigan
Indiana
Ohio

Date	04/16/2010
Drawn By	MJQ
Designed By	MJQ
Scale	NA
Project	PE55161H

SCHEMATIC SITE PLAN
DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE
GATEWAY VISITOR CENTER AND PARKING
REDEVELOPMENT PROJECT
TRENTON, MICHIGAN

No.	Revision Date

Figure No. 2



NOTE:
1. DRAWING WAS TAKEN FROM WAYNE COUNTY SITE PLAN.
2. FEATURES ARE APPROXIMATE AND NOT TO SCALE.

LEGEND

APPROXIMATE EXPOSURE BARRIER IMPROVEMENT AREA

EXPOSURE BARRIER IMPROVEMENT LOCATION DIAGRAM DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE GATEWAY VISITOR CENTER AND PARKING REDEVELOPMENT PROJECT TRENTON, MICHIGAN

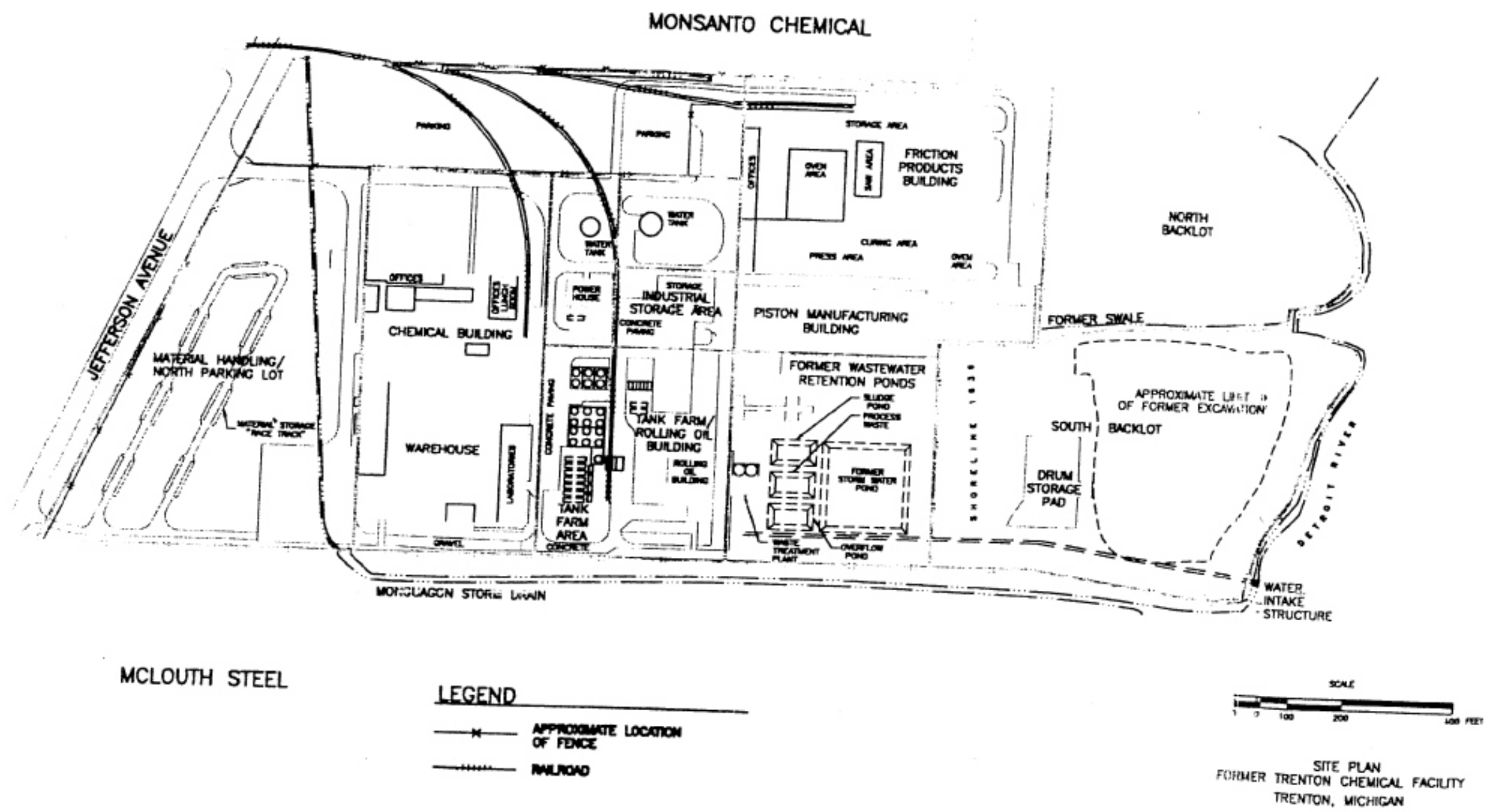
Date 04/16/2010
Drawn By MJQ
Designed By MJQ
Scale NA
Project PE55161H

Michigan
Indiana
Ohio

www.sme-usa.com

No.	Revision Date

Figure No. 3



NOTE:
1. DRAWING WAS TAKEN FROM WAYNE COUNTY SITE PLAN.
2. FEATURES ARE APPROXIMATE AND NOT TO SCALE.


Revision Date									
No.									
SUMMARY OF FORMER SITE FEATURES									
DETROIT RIVER INTERNATIONAL WILDLIFE REFUGE									
GATEWAY VISITOR CENTER AND PARKING									
REDEVELOPMENT PROJECT									
TRENTON, MICHIGAN									
Date	04/16/2010	Drawn By	MJQ	Designed By	MJQ	Scale	NA	Project	PE55161H
Michigan Indiana Ohio									
 www.sme-usa.com									

Figure No. 4

**Determination of Site & Property Ownership Eligibility for
USEPA Brownfield Revolving Loan Fund Utilizing USEPA Criteria**

The Downriver Community Conference (DCC) has made an affirmative determination as to the eligibility of Wayne County to receive a \$200,000 sub-grant from their USEPA Revolving Loan Fund (RLF) Grant to fund eligible environmental response activities at the Detroit River International Wildlife Refuge Gateway Visitor Center and Parking Redevelopment Project in Trenton, Michigan (the project site). The project site is located the eastern portion of the Detroit River International Wildlife Refuge Gateway in Trenton, Michigan (the Gateway site). The figure attached depicts the project site (Area 3 and Area 4). The basis for the eligibility determination is presented below.

- 1. Identify the proposed sub-grantee:** Wayne County, 600 Randolph, Detroit, MI 48226
- 2. Site Name:** Detroit River International Wildlife Refuge Gateway Visitor Center and Parking Redevelopment Project.
 - a. Site Address:** 5437 West Jefferson Avenue, Trenton, MI 48183. The project site occupies approximately 9 acres and is located on the eastern portion of the larger 44-acre Gateway site. The legal tax identification number of the Gateway site is 54-02-699-000-2.
 - b. Operational History and Environmental Concerns:** The Gateway site was formerly occupied by the Trenton Chemical Facility. Chrysler Corporation (Chrysler) operated the Trenton Chemical Facility for 44 years in the manufacture of automobile components such as brake pad adhesives, blended oils, paints, sealers, powered metal parts, asbestos brake pads, and phenolic brake pistons. The Gateway site previously contained wastewater treatment ponds, various buildings that stored chemicals and waste products, a drum burial area, an oil lagoon, a sludge area, and a tank farm that contained above grounds storage tanks (ASTs) and underground storage tanks (USTs). In addition, fill material was placed in low-lying areas on the east portion of the Gateway site between 1940 and 1967 to expand the site's eastern shoreline and increase the usable size of the site. Soil and groundwater at the Gateway site became contaminated as a result of these historical activities.

Plant deactivation activities began in 1990 and the buildings were removed but some foundations remain in place. A Remedial Action Plan and Closure Report (RAP) was completed for the Gateway site in 1997, and the Michigan Department of Natural Resources and the Environment (MDNRE, f/k/a Michigan Department of Environmental Quality) granted the Gateway site an industrial closure under Part 201 of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). On-site cleanup activities included the removal or capping of inorganic (asbestos, arsenic, barium, cadmium, lead, cyanide, and thallium) and organic (benzene, chlorobenzene, methylene chloride, toluene, vinyl chloride, and xylene) contaminated soils. The closure also included the removal of underground storage tanks and drums and the following deed restrictions: soils cannot be removed from the Gateway site without characterization, soil and concrete caps must be maintained, and groundwater may not be used as a drinking water source.

- c. Current Site Use and Activity: The Gateway site is currently being redeveloped into the Wildlife Refuge Visitor Center and parking area. The Gateway site will include a park-like setting with restored woodlands and wetlands, a new Visitor Center facility, nature trails, various site amenities, as well as direct and indirect connections to existing waterways, greenways, and the adjoining Humbug Marsh. The redevelopment of the Gateway site and the construction of the Visitor Center Facility will require the additional capping of select areas of the Gateway site to ensure the protection of human health and the environment. The project site is bound by the cap improvement areas depicted on the attached figure (Area 3 and Area 4).

3. Identify who currently owns the site.

- a. Current Ownership of Site: Wayne County owns the Gateway site and purchased it on December 20, 2002.
- b. Previous Owner of the Site: Wayne County purchased the Gateway site from the Chrysler.

4. Site Affirmations:

- a. The site is not listed or proposed for listing on the National Priorities List (NPL).
- b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- c. The site is not subject to the jurisdiction, custody, or control of the United States government.

5. Identify how the site became contaminated and, to the extent possible, describe the nature and extent of the contamination.

Soil and groundwater at the Gateway site were contaminated as a result of releases of hazardous and petroleum substances associated with historical activities described above in Section 2(b). Multiple environmental assessments and remedial actions have been completed at the Gateway site starting in the late 1980s with the most recent in 2005. The following summarizes the environmental concerns at the Gateway site:

- Lead concentrations were measured above MDNRE Part 201 Generic Residential Direct Contact Cleanup Criteria and Screening Levels (residential direct contact cleanup criteria) in soil on the east portion of the Gateway site.
- Lead and arsenic concentrations were measured above MDNRE Part 201 residential direct contact cleanup criteria in surface soils in several areas of the Gateway site, particularly in the southeast portion where fill material is present.
- Xylenes and benzo(a)pyrene concentrations were measured above MDNRE Part 201 residential direct contact cleanup criteria in soil in the former tank farm area on the south-central portion of the Gateway site.

- Selenium, silver, mercury, chlorobenzene, naphthalene, 1,2,4-trimethylbenzene, xylene, fluoranthene, and phenanthrene concentrations were measured above MDNRE Part 201 residential groundwater surface water interface (GSI) protection cleanup criteria in soil in several areas of the Gateway site, particularly in the southeast portion where fill material is present.
- Asbestos-containing materials are capped with one foot of clean soil in the northwest “backlot” area of the Gateway site.
- Benzene, chlorobenzene, methylen chloride, vinyl chloride, arsenic, barium, cadmium, lead, and thallium concentrations were measured in groundwater above MDNRE Part 201 residential groundwater surface water interface (GSI) cleanup criteria on the southeast portion of the Gateway site.
- Benzene concentrations were measured in groundwater above MDNRE Part 201 residential drinking water and GSI cleanup criteria in the former tank farm area on the south-central portion of the Gateway site. The benzene contamination was demonstrated to be limited to the former tank farm area and did not extend beyond the Gateway site property boundaries.

The soil contamination at the Gateway site has been addressed primarily by the installation and maintenance of clean soil caps. The MDNRE approved RAP indicated that no further remedial action was necessary for the groundwater contamination on the southeast portion of the Gateway site because source material had been removed and estimated constituent concentrations for groundwater venting to the Trenton Channel of the Detroit River were below the Part 201 groundwater surface water interface criteria.

6. Liability for contamination and known ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is sought.

Wayne County is not liable for contamination at the project site because Wayne County is not liable for contamination at the Gateway site. Wayne County is not liable for contamination at the Gateway site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Wayne County also consulted with the USEPA, regarding potential liability for contamination at the Gateway site with respect to CERCLA. Wayne County received a September 25, 2002, letter from the USEPA stating that no further Superfund action was contemplated at the Gateway site since contamination at the site had been addressed with the 1997 MDNRE approved RAP. Moreover, the USEPA noted that the RAP completed the requirements outlined in a 1994 Consent Decree issued to Chrysler by the MDNRE. Furthermore, the 1994 Consent Decree included a provision by which a prospective purchaser could enter into an agreement with Chrysler and the State of Michigan and receive a covenant-not-to-sue from the State for pre-existing conditions. Prior to purchasing the Gateway site, Wayne County executed this provision and received an Administrative Order on Consent, Covenant Not to Sue and Contribution Protection from the Michigan Department of the Attorney General and Chrysler.

Wayne County is also not liable for contamination at the Gateway site under Michigan’s Part 201 of NREPA. In addition to the activities described above, prior to purchasing the Gateway site, Wayne County completed a Category “N” Baseline Environmental

Assessment (BEA) and Section 7a Compliance Analysis (CA). The Category “N” BEA stated that Wayne County will not use any significant hazardous substances at the Gateway site and that fact formed the basis for delineating pre-existing contamination at the time of purchase from future contamination. The MDNRE reviewed and affirmed that the BEA was adequate for obtaining a liability exemption for the cleanup of pre-existing contamination at the Gateway site. The MDNRE also reviewed and affirmed that the CA was consistent with the due care obligations set forth in Section 20107a of the NREPA for the protection of human health.

Future construction activities on the Gateway site must comply with the Restrictive Covenant included in the 1997 RAP and specifically must maintain soil cap exposure barriers. Wayne County’s primary due care responsibilities during construction of the DRIWR will consist of maintaining and improving soil caps.

7. Timing of Hazardous Substance Disposal:

Wayne County is not liable for contamination at the Gateway site and affirms that they have not, at any time, arranged for the disposal of hazardous substances at the Gateway site, transported hazardous substances to the Gateway site, or caused or contributed to any release of hazardous substances at the Gateway site. Disposal of hazardous substances at the Gateway site occurred prior to acquisition by Wayne County.

8. Pre-Purchase Inquiry:

Prior to Wayne County Ownership in 2003

- Chester Engineers began plant deactivation activities in 1987 on behalf of the Chrysler Corporation.
- McLaren Hart Environmental Engineers Corporation completed the 1997 RAP and associated activities on behalf of the Chrysler Corporation. The RAP completed the requirements of the MDNR Consent Decree which also included the following investigations/reports:
 - Site Assessment Report (1994)
 - Health and Safety Plan (1995)
 - Quality Assurance Project Plan (1995)
 - Sampling and Analysis Plan (1995)
 - Site Assessment Work Plan (1995)
 - Final Site Assessment Summary Report (1995)
- Wayne County conducted All Appropriate Inquiries (AAI) consistent with the standards of an ASTM 1527-00 Phase I ESA. Wayne County evaluated the history of the previous uses of the Gateway site and surrounding area. This included obtaining and reviewing the documents listed above that evaluated recognized environmental conditions (RECs) associated with the past uses of the Gateway site. This evaluation also included the potential for impact from adjacent properties. Documents were reviewed for accurateness and completeness and sources were verified. Secondly, Wayne County completed a site reconnaissance to verify site conditions. The visit entailed both a visual and physical observation of the Gateway site to evaluate existing

conditions and the remedial measures implemented by Chrysler to satisfy site-closure pursuant to the conditions of the 1994 consent decree between Chrysler and the MDNR. Lastly, interviews were conducted with local government officials and other individuals with knowledge of past historical uses of the Gateway site and the current site conditions. The Gateway site is currently vacant and has been vacant since formal closure of the Gateway site was initiated in 1994.

- The Mannik & Smith Group, Inc. completed a Category “N” BEA and CA for the Gateway site in 2002 on behalf of Wayne County prior to their acquisition of the Gateway site.

Subsequent to Wayne County Ownership in 2003

- Camp Dresser & McKee conducted a Phase II ESA of the Gateway site in 2005 for Hamilton Anderson Associates on behalf of Wayne County.

9. Post-Acquisition Uses:

Since acquiring the Gateway site in 2002, Wayne County has worked to redevelop the Gateway site into a county park and wildlife refuge as described in Section 2(b). The Gateway site will continue to be owned by Wayne County and the Gateway site will be managed by the International Wildlife Refuge (IWR) Alliance.

10. Affirm that the RLF Grant recipient is not potentially liable for contamination at the site under CERCLA Section 107

The DCC is not liable for contamination at the Gateway site, which includes the project site, under CERCLA or Part 201 of NREPA. The DCC is not a current owner of the Gateway site, was not an owner or operator of a facility on the Gateway site at time of disposal of a hazardous substance, did not arrange for treatment or disposal of hazardous substances at facilities on the Gateway site, and did not accept hazardous substances for transport to disposal or treatment facilities at the Gateway site. The DCC affirms that they have not, at any time, caused or contributed to any release of hazardous substances at the Gateway site.

11. Affirm that the sub-grant recipient is not potentially liable for contamination at the site under CERCLA Section 107

As discussed in Section 5, Wayne County is not liable for contamination at the Gateway site, which includes the project site, under CERCLA or Part 201 of NREPA. Wayne County was not an owner or operator of a facility on the Gateway site at time of disposal of a hazardous substance, did not arrange for treatment or disposal of hazardous substances at facilities on the Gateway site, and did not accept hazardous substances for transport to disposal or treatment facilities at the Gateway site. Wayne County affirms that they have not, at any time, caused or contributed to any release of hazardous substances at the Gateway site.

12. Continuing Obligations:

The redevelopment of the Gateway site into a county park and wildlife refuge will require the improvement of the soil cap exposure barrier in five areas of the Gateway site. The cap

improvements will be consistent with the 1994 Consent Judgment, the 1997 RAP, and the restrictive covenants placed on the Gateway site.

- a. Continuing Releases: Source material has been removed from the Gateway site and the 1997 RAP did not require additional actions related to groundwater contamination at the Gateway site.
- b. Prevent Future Releases: Wayne County will not use any hazardous substances at the Gateway site.
- c. Prevent or Limit Exposure to Previously Released Hazardous Substances: Wayne County will maintain or improve the existing soil caps at the Gateway site to prevent human and environmental exposure to the encapsulated contaminated soil.
- d. Wayne County will comply with all land use restrictions and institutional controls at the Gateway site.
- e. If the liable party is required to conduct additional cleanup actions, Wayne County will assist and cooperate with the cleanup and provide access to the Gateway site.
- f. Wayne County will comply with all information requests and administrative subpoenas that have or may be issued in connection with the Gateway site, and provide all legally required notices.

